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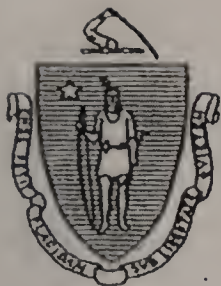
**RE: 50 Tufts Street
Somerville, Massachusetts**

624724075

Letters to Residents
April 27, 2005

REF
354,
353
661

Item No.	Document Date	Date Received	From	To	Subject
1	27-Apr-05		GEI	DEP	Letters to Residents
2	9-Nov-05		DEP	UniFirst	Notice of Responsibility (RTNs: 3-24376, 3-23246, 3-24358)
3	22-Nov-05	22-Nov-05	GEI	DEP	Notice of Responsibility Response (RTNs: 3-24376, 3-23246, 3-24358)
4	9-Jan-06	9-Jan-06	GEI	DEP	Immediate Response Action Plan (RTNs: 3-24376, 3-23246, 3-24358)
5	9-Jan-06	9-Jan-06	GEI	DEP	Imminent Hazard Evaluation (RTN 3-23246 and 3-24358)
6	15-Feb-06	22-Feb-06	GEI	DEP	Letter to City of Somerville
7	8-May-06	9-May-06	GEI	DEP	IRA Status Report #1
8	26-Jun-06	29-Jun-06	GEI	DEP	BWSC-105 Forms for IRA Plan & SR1 (RTN 3-24358 and RTN 3-24376)
9	16-Jun-06	16-Jun-06	GEI	DEP	Phase I Initial Site Investigation and Tier Classification
10	27-Jun-06	29-Jun-06	GEI	DEP	Interim IRA Status Report and IRA Plan Modification
11	11-Jul-06		GEI	DEP	Phase I/Tier Classification Copy of Public Notice Tear Sheet (RTNs: 3-24376, 3-23246, 3-24358)
12	24-Jul-06		GEI	DEP	Copy of Phase I/Tier Classification Copy of Public Notice Tear Sheet sent to John Buckley, DEP
13	17-Aug-06	Email	DEP	UniFirst	Recovery of Response Action Costs (RTN: 3-24376)
14	21-Sep-06		GEI	DEP	IRA Plan Modification No. 2
15	21-Sep-06	21-Sep-06	GEI	DEP	Retraction of Imminent Hazard Notification (RTN: 3-26114)
16	10-Nov-06	15-Nov-06	UniFirst	DEP	Release Notification and Response to Retraction Denial Letter (RTN: 3-26114)
17	13-Nov-06	13-Nov-06	GEI	DEP	IRA Status Report #2 and Plan Modification #3
18	13-Nov-06	15-Nov-06	GEI	DEP	Immediate Response Action Plan (RTN 3-26114)
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EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
METROPOLITAN BOSTON – NORTHEAST REGIONAL OFFICE

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Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

April 27, 2005

Mr. Avani Compos
P.O. Box 423
Somerville, MA 02143

Dear Mr. Compos:

On February 23, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 9 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home.

The results of the analyses show a low level of contamination, specifically 0.27 parts per billion volume (ppbv) of tetrachloroethylene (PCE), was found in the samples collected on the occupied first floor of your home. An estimated level of 0.19 ppbv was found in the basement, indicating the possible presence of contaminants, but at a level below the laboratory's ability to accurately report the concentration.

The 0.27 ppbv level is well below the Department's threshold limit of 1.6 ppbv for PCE, which would constitute an Imminent Hazard, or a significant risk of harm to health over a short period of time. The value is also below the levels DEP typically finds in homes. However, based on the testing results from all of the homes on Tufts Street, DEP believes that this PCE is due to the contaminants in the groundwater near your home.

Because these levels are so low, DEP recommends occasional venting (opening windows) in order to further reduce concentrations. Additional measures are not necessary at this time.

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator, at 1-617-556-1057. TDD Service - 1-800-298-2207.

One Winter Street, Boston, MA 02108 • Phone (617) 654-6500 • Fax (617) 556-1049 • TDD # (800) 298-2207

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Attached are the laboratory results of the air samples taken from your property. .If you have any questions, please call me at (617) 654-6554.

Sincerely,

A handwritten signature in cursive script that reads "Irene M. Dale".

Irene M. Dale
Environmental Engineer



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Commissioner

April 27, 2005

Ms. Dolores DeVellis
11 Tufts Street
Somerville, MA 02145

Dear Ms. DeVellis:

On February 23, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 11-13 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home.

The results of the analyses show a low level of contamination, specifically 0.26-0.28 parts per billion volume (ppbv) of tetrachloroethylene (PCE), was found in the samples collected in the basement of your home. An estimated level of 0.15 ppbv was found on the occupied first floor, indicating the possible presence of contaminants, but at a level below the laboratory's ability to accurately report the concentration.

The 0.26-0.28 ppbv level is well below the Department's threshold limit of 1.6 ppbv for PCE, which would constitute an Imminent Hazard, or a significant risk of harm to health over a short period of time. The value is also below the levels DEP typically finds in homes. However, based on the testing results from all of the homes on Tufts Street, DEP believes that this PCE is due to the contaminants in the groundwater near your home.

Because these levels are so low, DEP recommends occasional venting (opening windows) in order to further reduce concentrations. Additional measures are not necessary at this time.

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Attached are the laboratory results of the air samples taken from your property. If you have any questions, please call me at (617) 654-6554. I will be contacting you shortly to schedule the work once our proposal(s) are ready.

Sincerely,

Irene M. Dale
Environmental Engineer



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April 27, 2005

Mr. & Mrs. Remy Prevost
17 Tufts Street
Somerville, MA 02145

Dear Mr. & Mrs. Prevost:

On March 24, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 17 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home.

The results of the analyses indicate that contamination, specifically 1.3 parts per billion volume (ppbv) of tetrachloroethylene (PCE), was found in the sample collected in the basement of your home. A level of 0.69 ppbv was found on the occupied first floor.

The 1.3 ppbv level is below the Department's threshold limit of 1.6 ppbv for PCE, which would constitute an Imminent Hazard, or a significant risk of harm to health over a short period of time. The value is also below the levels DEP typically find in homes. However, based on the testing results from all of the homes on Tufts Street, DEP believes that this PCE is due to the contaminants in the groundwater near your home.

To minimize the further migration of contaminants from the groundwater into your residence, DEP proposes "sealing" your basement. This may include making covers for the sumps/cleanouts located in the floor and/or coating the basement floor with a material which will retard this migration. This work will be done at the State's expense, with no cost to you. DEP is currently working with a contractor to determine the best method(s) of conducting this work, and any proposal(s) will be shared with you for your review and approval prior to initiating any work.

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Attached are the laboratory results of the air samples taken from your property. If you have any questions, please call me at (617) 654-6554.

Sincerely,

A handwritten signature in cursive script that reads "Irene M. Dale".

Irene M. Dale
Environmental Engineer



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Commissioner

April 27, 2005

Mr. & Mrs. Gerald Laurentano
19 Tufts Street
Somerville, MA 02145

Dear Mr. & Mrs. Laurentano:

On March 24, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 19 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home.

The results of the analyses indicate that contamination, specifically 0.47 parts per billion volume (ppbv) of tetrachloroethylene (PCE), was found in the sample collected in the basement of your home. An estimated level of 0.14 ppbv was found on the occupied first floor, indicating the possible presence of contaminants but at a level below the laboratory's ability to accurately report the concentration.

The 0.47 ppbv level is below the Department's threshold limit of 1.6 ppbv for PCE, which would constitute an Imminent Hazard, or a significant risk of harm to health over a short period of time. The value is also below the levels DEP typically find in homes. However, based on the testing results from all of the homes on Tufts Street, DEP believes that this PCE is due to the contaminants in the groundwater near your home.

To minimize the further migration of contaminants from the groundwater into your residence, DEP proposes "sealing" your basement. This may include making covers for the sumps/cleanouts located in the floor and/or coating the basement floor with a material which will retard this migration. This work will be done at the State's expense, with no cost to you. DEP is currently working with a contractor to determine the best method(s) of conducting this work, and

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THE UNIVERSITY OF CHICAGO
DIVISION OF THE PHYSICAL SCIENCES
DEPARTMENT OF PHYSICS

PHYSICS 354
LECTURE 10
THERMAL CONDUCTIVITY

LECTURER: JOHN H. COLEMAN
DATE: 1964

TOPIC: THERMAL CONDUCTIVITY
SUBTOPIC: MECHANISMS OF HEAT CONDUCTION

1. INTRODUCTION
2. MECHANISMS OF HEAT CONDUCTION

3. MECHANISMS OF HEAT CONDUCTION
4. MECHANISMS OF HEAT CONDUCTION

5. MECHANISMS OF HEAT CONDUCTION
6. MECHANISMS OF HEAT CONDUCTION

7. MECHANISMS OF HEAT CONDUCTION
8. MECHANISMS OF HEAT CONDUCTION

9. MECHANISMS OF HEAT CONDUCTION
10. MECHANISMS OF HEAT CONDUCTION

any proposal(s) will be shared with you for your review and approval prior to initiating any work.

Attached are the laboratory results of the air samples taken from your property. If you have any questions, please call me at (617) 654-6554. I will be contacting you shortly to schedule the work once our proposal(s) are ready.

Sincerely,

A handwritten signature in cursive script that reads "Irene M. Dale".

Irene M. Dale
Environmental Engineer



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April 27, 2005

Mr. Nilson Dasilva
23 Tufts Street
Somerville, MA 02145

Dear Mr. Dasilva:

On February 23, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 23 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home.

The results of the analyses show a low level of contamination, specifically 0.34 parts per billion volume (ppbv) of tetrachloroethylene (PCE), was found in the samples collected in the occupied basement of your home. A level of 0.23 ppbv was found on the occupied first floor.

The 0.34 ppbv level is well below the Department's threshold limit of 1.6 ppbv for PCE, which would constitute an Imminent Hazard, or a significant risk of harm to health over a short period of time. The value is also below the levels DEP typically finds in homes. However, based on the testing results from all of the homes on Tufts Street, DEP believes that this PCE is due to the contaminants in the groundwater near your home.

Because these levels are so low, DEP recommends occasional venting (opening windows) in order to further reduce concentrations. Additional measures are not necessary at this time.

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Attached are the laboratory results of the air samples taken from your property. If you have any questions, please call me at (617) 654-6554.

Sincerely,

Irene M. Dale

Irene M. Dale
Environmental Engineer



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April 27, 2005

Mr. John Boveri
25 Tufts Street
Somerville, MA 02145

Dear Mr. Boveri:

On February 23, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 23 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home.

The results of the analyses show a low level of contamination, specifically 0.23 parts per billion volume (ppbv) of tetrachloroethylene (PCE), was found in the samples collected in the basement of your home. No PCE was detected in the basement.

The 0.23 ppbv level is well below the Department's threshold limit of 1.6 ppbv for PCE, which would constitute an Imminent Hazard, or a significant risk of harm to health over a short period of time. The value is also below the levels DEP typically finds in homes. However, based on the testing results from all of the homes on Tufts Street, DEP believes that this PCE is due to the contaminants in the groundwater near your home.

Because these levels are so low, DEP recommends occasional venting (opening windows) in order to further reduce concentrations. Additional measures are not necessary at this time.

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Sincerely,

A handwritten signature in cursive script that reads "Irene M. Dale".

Irene M. Dale
Environmental Engineer



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March 3, 2005

Mr. & Mrs. Richard Papa
27 Tufts Street
Somerville, MA 02145

Dear Mr. & Mrs. Papa:

On February 9, 2005 the Department of Environmental Protection (DEP) collected air samples from the basement and first floor of your property located at 27 Tufts Street, Somerville, to test for the presence of Volatile Organic Compounds (VOCs). DEP initiated this sampling in response to receiving the results of an environmental investigation of a disposal site located at 50 Tufts Street, which indicated that contaminated groundwater had been discovered near your home. I am pleased to report that no detectable contamination (listed as ND on the report) was found.

The results from this sampling round does not mean that no contamination is present in the indoor air, merely that DEP can rule out very severe impacts at this point in time. In order to determine whether contamination may be present at levels below the limits of detection used in the first screening, DEP has proposed to repeat the test using a more sensitive sampling method, which was conducted in your home on February 23, 2005 to better determine whether contaminants from the site are present in your indoor air. We will let you know these results as well when they are available.

Attached are the laboratory results of the air samples taken from, your property. Please note that as several homes were reported on one sheet, we have removed the results from other properties.

If you have any questions, please call me at (617) 654-6554.

Sincerely,

Irene M. Dale
Environmental Engineer

This Information is available in alternate format. Call Donald M. Gomes, ADA Coordinator, at 1-617-556-1057. TDD Service - 1-800-298-2207.

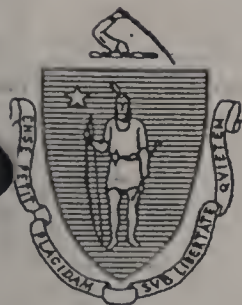
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Notice of Responsibility (RTNs: 3-24376, 3-23246, 3-
24358)

November 9, 2005



COMMONWEALTH OF MASSACHUSETTS
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DEPARTMENT OF ENVIRONMENTAL PROTECTION
METROPOLITAN BOSTON – NORTHEAST REGIONAL OFFICE

FILE
VN

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Lieutenant Governor

STEPHEN R. PRITCHARD
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

By Certified Mail # 7003 3110 0001 6107 9566

November 9, 2005

Unifirst Corporation
68 Jonspin Road
Wilmington, MA 01887

RE: Somerville
50 Tufts Street
RTNs: 3-24376 , 3-23246, 3-24358

**NOTICE OF RESPONSIBILITY;
NOTICE OF NEED TO CONDUCT IRA;
DESIGNATION OF INTERIM DEADLINES
M.G.L. c. 21E & 310 CMR 40.0000**

Attention: Ronald D. Croatti, President

Dear Mr. Croatti:

On October 3, 2003 Massachusetts Department of Environmental Protection (MassDEP) received notification that a release of oil and/or hazardous material occurred at the subject site which required the initiation of one or more Immediate Response Actions as described in Section 310 CMR 40.0410 of the Massachusetts Contingency Plan (MCP). MassDEP has also determined that Unifirst Corporation is a Potentially Responsible Party (PRP) pursuant to Massachusetts General Law, Chapter 21E (M.G.L. c. 21E), and the MCP. Attached to this letter is a fact sheet discussing the liability provisions of M.G.L. c. 21E, please refer to the statute for a complete discussion of these provisions.

MassDEP encourages parties with liabilities under M.G.L. c. 21E to take prompt action in response to releases and threats of release of oil and/or hazardous material. By taking prompt action, you may significantly lower your assessment and cleanup costs and avoid the imposition of, or reduce the amount of, certain permit and annual compliance fees for response actions payable under 310 CMR 4.00. Please refer to M.G.L. c. 21E for a complete description of potential liability.

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STATUTORY LIABILITIES

Section 5 makes the following parties liable to the Commonwealth of Massachusetts: current owners or operators of a site from or at which there is or has been a release/threat of release of oil or hazardous material; any person who owned or operated a site at the time hazardous material was stored or disposed of; any person who arranged for the transport, disposal, storage or treatment of hazardous material to or at a site; any person who transported hazardous material to a transport, disposal, storage or treatment site from which there is or has been a release/threat of release of such material; and any person who otherwise caused or is legally responsible for a release/threat of release of oil or hazardous material at a site.

This liability is "strict", meaning it is not based on fault, but solely on your status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that you may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties.

The MCP requires responsible parties to take necessary response actions at properties where there is or has been a release or threat of release of oil and/or hazardous material. If you do not take the necessary response actions, or fail to perform them in an appropriate and timely manner, MassDEP is authorized by M.G.L. c. 21E to have the work performed by its contractors. By taking such actions, you can avoid liability for response action costs incurred by MassDEP and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

You may be liable for up to three (3) times all response action costs incurred by MassDEP. Response action costs include, without limitation, the cost of direct hours spent by MassDEP employees arranging for response actions or overseeing work performed by persons other than MassDEP or their contractors, expenses incurred by MassDEP in support of those direct hours, and payments to MassDEP's contractors. (For more detail on cost liability, see 310 CMR 40.1200.)

MassDEP may also assess interest on costs incurred at the rate of twelve percent (12%), compounded annually. To secure payment of this debt, the Commonwealth may place liens on all of your property in the Commonwealth. To recover the debt, the Commonwealth may foreclose on these liens or the Attorney General may bring legal action against you.

In addition to your liability for up to three (3) times all response action costs incurred by MassDEP, you may also be liable to the Commonwealth for damages to natural resources caused by the release. Civil and criminal liability may also be imposed under M.G.L. c. 21E, § 11, and civil administrative penalties may be imposed under M.G.L. c. 21A, § 16 for each violation of M.G.L. c. 21E, the MCP, or any order, permit or approval issued thereunder.

BACKGROUND

The above-referenced disposal site was originally reported on October 3, 2003 pursuant to 310 CMR 40.0315, due to the discovery of chlorinated volatile organic compounds (CVOCs) in soil and groundwater. MassDEP assigned the Release Tracking Number (RTN) 3-23246 at that time.

An indoor air sample was collected from the office portion of the building located at 50 Tufts Street on September 21, 2004, and an Imminent Hazard Evaluation was conducted using the analytical results. The indoor air level was determined to potentially pose an Imminent Hazard to the commercial workers in the building at the time. The information was provided to MassDEP as a 2-hour notification on October 22, 2004, and was assigned RTN 3-24358.

On October 29, 2004, MassDEP received documents which indicated additional environmental assessment had been conducted to further delineate the disposal site. This included the installation of 6 additional groundwater monitoring wells along Tufts Street. Testing of the groundwater in these wells showed concentrations of Volatile Organic Compounds in excess of 5 milligrams per liter in groundwater less than 15 feet below ground surface and within 30 feet of occupied residential structures. RTN 3-24376 was assigned to the release condition. Due to these results, MassDEP conducted indoor air testing in seven (7) potentially affected homes on Tufts Street. Results indicated that two (2) homes were impacted by the release, and MassDEP determined that remedial activities needed to be conducted.

MassDEP determined that a Condition of Substantial Release Migration, as described in 310 CMR 40.0006, exists at the site and required the initiation of an Immediate Response Action. Pursuant to 310 CMR 40.0412(3), Immediate Response Actions (IRA) shall be conducted at sites where a Condition of Substantial Release Migration has been identified. Such response actions are required to prevent or mitigate Critical Exposure Pathways, as stated in 310 CMR 40.0414(3) and 40.0414(4).

NECESSARY RESPONSE ACTIONS

MassDEP has determined that a possible Imminent Hazard exists at the 50 Tufts Street site as described in 310 CMR 40.0321(2). Pursuant to 310 CMR 40.0412(1), an Immediate Response Action shall be conducted at sites where a release or threat of release of any oil and/or hazardous material has occurred, in any quantity or concentration that poses or could pose an Imminent Hazard.

MassDEP has also determined that a Condition of Substantial Release Migration (SRM) and a Critical Exposure Pathway (CEP), both described in 310 CMR 40.0006, exist at the subject site. Pursuant to 310 CMR 40.0412(3), Immediate Response Actions shall be conducted at sites where a condition of Substantial Release Migration has been identified. 310 CMR 40.0414(3) states that "Immediate Response Actions shall be presumed to require the elimination and/or mitigation of Critical Exposure Pathways...". Currently Somerville Two, LLC (a fiduciary currently controlling the property, see section entitled "Identification of Other Potentially Responsible Parties" below) has been conducting response actions to address the SRM.

You, as a Potentially Responsible Party for this release, may undertake the necessary Immediate Response Actions at this site in lieu of MassDEP provided that you submit to this Office, within sixty (60) days from the date of this letter, an Immediate Response Action (IRA) Plan prepared in accordance with 310 CMR 40.0424. An IRA Plan for each release must be submitted to MassDEP. The IRA Plans may be combined into one if desired. At a minimum, the Immediate Response Action Plan(s) must outline the following:

- The opinion of a Licensed Site Professional stating whether or not an Imminent Hazard actually exists at this site, or if such an opinion cannot be rendered, a description of the assessment activities that have been taken and are planned to be taken to determine if an Imminent Hazard exists at this site.
- A monitoring plan for the properties located at 17 and 19 Tufts Street, in which remedial work has been conducted. At a minimum quarterly indoor air testing must be done.
- A monitoring plan for the properties located at 9, 11/13, 23, 25 and 27 Tufts Street to ensure additional residences are not affected by site conditions.
- An evaluation of the potential for impact to additional receptors.
- A description of any other steps you plan to take to address these IRA conditions.

The services of a Licensed Site Professional must be engaged to conduct these activities within the following specified time periods:

1. Within two weeks of the date of your receipt of this letter, an Imminent Hazard Evaluation must be initiated to determine if an Imminent Hazard actually exists at the subject site. In accordance with 310 CMR 40.0426(3), an LSP opinion on whether an Imminent Hazard exists at the site must be submitted to MassDEP within sixty (60) days of the date of this letter.
2. Within sixty (60) days from the date of this letter an Immediate Response Action Plan(s), prepared in accordance with 310 CMR 40.0410, must be submitted to MassDEP.
3. Within one (1) year of the date of this letter, a Response Action Outcome Statement or Tier Classification and Phase I Report must be submitted to MassDEP in accordance with 310 CMR 40.0404(3)(d).

Please note that the deadlines established for response actions and for the submission of the Immediate Response Action Plan(s) are being established as Interim Deadlines pursuant to 310 CMR 40.0167. If you fail to voluntarily undertake the response action(s) necessary at the subject site within the Interim Deadline established herein, MassDEP may perform such response actions and seek to recover MassDEP's costs and/or may initiate other appropriate enforcement actions to ensure that such response actions are conducted. MassDEP's decision to establish one or more Interim Deadlines in accordance with 310 CMR 40.0167 is not subject to M.G.L. c. 30A or any other law governing adjudicatory proceedings.

IDENTIFICATION OF OTHER POTENTIALLY RESPONSIBLE PARTIES

MassDEP has identified one Other Party associated with this site. As mentioned above, M.G.L. c. 21E liability is "strict", meaning it is not based on fault, but solely on a person's status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that a person may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties. The following party has undertaken response actions as a fiduciary:

Somerville Two, LLC
c/o Lawson & Weitzen, LLP
88 Black Falcon Avenue
Suite 345
Boston, MA 02210-2424
ATTN: Clare B. Burhoe, Esq.

MassDEP encourages all parties listed here to contact one another in order to respond to this notification. A joint response would be acceptable to MassDEP. MassDEP encourages PRPs to take prompt action in response to releases and threats of release of oil and/or hazardous material. By taking prompt action, PRPs may significantly lower their assessment and cleanup costs and avoid the imposition of, or reduce the amount of, certain permit and annual compliance fees for response actions payable under 310 CMR 4.00.

GENERAL RESPONSE ACTION REQUIREMENTS

The subject site shall not be deemed to have had all the necessary and required response actions taken unless and until all substantial hazards presented by the site have been eliminated and a level of No Significant Risk exists or has been achieved in compliance with M.G.L. c. 21E and the MCP. In addition, the MCP requires persons undertaking response actions at disposal sites to perform Immediate Response Actions (IRAs) in response to "sudden releases", Imminent Hazards and Substantial Release Migration. Such persons must continue to evaluate the need for IRAs and notify MassDEP immediately if such a need exists.

You must employ or engage a Licensed Site Professional (LSP) to manage, supervise or actually perform the necessary response actions at the subject site. In addition, the MCP requires persons undertaking response actions at a disposal site to submit to MassDEP a Response Action Outcome Statement (RAO) prepared by an LSP in accordance with 310 CMR 40.1000 upon determining that a level of No Significant Risk already exists or has been achieved at a disposal site or portion thereof. (You may obtain a list of the names and addresses of these licensed professionals from the Board of Registration of Hazardous Waste Site Cleanup Professionals at (617) 556-1091 or on the worldwide web at <http://mass.gov/lsp/lsphome.html>.)

You should notify MassDEP in writing no later than 5:00 p.m. on November 22, 2005 if you intend to conduct the necessary activities and submit the required documents to MassDEP.

If you intend to undertake the necessary Immediate Response Actions at this site, you must notify Irene Dale of MassDEP's Northeast Regional Office (978)694-3397 of such an intent by no later than 5:00 p.m. on **November 22, 2005**. If you fail to provide this notice and to voluntarily undertake the response action(s) necessary at the subject site within the time periods established

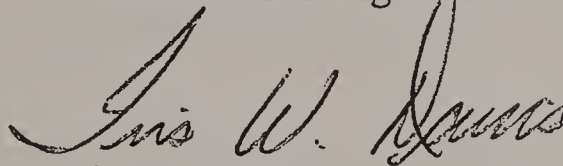
herein, MassDEP may perform such response actions and seek to recover its costs and/or may initiate other appropriate enforcement actions to ensure that such response actions are conducted.

If you have any questions concerning the content of this letter, please contact Irene Dale at the letterhead address or at (617)654-6554 through November 11, 2005. Effective November 14, 2005 please contact Irene Dale at 205B Lowell Street, Wilmington, MA, 01887 or at (978)694-3397. All future communications regarding this release must reference the Release Tracking Number provided in the subject heading of this letter.

Very truly yours,



Irene Dale
Environmental Engineer



Iris W. Davis
Section Chief
Compliance/Risk Reduction Branch

cc: Clare B. Burhoe, Cburhoe@Lawson-Weitzen.com
Vithal Deshpande, Environmental Coordinator, vdeshpande@ci.somerville.ma.us
Mayor Joseph Curtatone, Somerville City Hall, 93 Highland Ave, Somerville, MA 02143
Ms. Noreen Burke, Somerville Board of Health, nburke@ci.somerville.ma.us
DEP data entry/file (NOR/ISSUED), (C&E/INTLET)

ATTACHMENT #1

STATUTORY LIABILITY PROVISIONS OF M.G.L. c. 21E

The following is provided to advise you of the liability provisions of M.G.L. c. 21E for assessing and remediating releases of oil and/or hazardous materials to the environment. You are advised to review the following section and determine if you are a Responsible Party for the subject release. If, after reading this section, you do not know if you are a Responsible Party, you are advised to seek legal counsel to help you in making this determination.

Section 5 makes the following parties liable to the Commonwealth of Massachusetts: current owners or operators of a site from or at which there is or has been a release/threat of release of oil or hazardous material; any person who owned or operated a site at the time hazardous material was stored or disposed of; any person who arranged for the transport, disposal, storage or treatment of hazardous material to or at a site; any person who transported hazardous material to a transport, disposal, storage or treatment site from which there is or has been a release/threat of release of such material; and any person who otherwise caused or is legally responsible for a release/threat of release of oil or hazardous material at a site.

This liability is "strict", meaning it is not based on fault, but solely on one's status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that Responsible Parties may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties.

The 1993 MCP requires Responsible Parties to take necessary response actions at properties where there is or has been a release or threat of release of oil and/or hazardous material. If Responsible Parties do not take the necessary response actions, or fail to perform them in an appropriate and timely manner, MassDEP is authorized by M.G.L. c. 21E to have the work performed by its contractors.

Responsible Parties may be liable for up to three (3) times all response action costs incurred by MassDEP. Response action costs include, without limitation, the cost of direct hours spent by MassDEP employees arranging for response actions or overseeing work performed by persons other than MassDEP or their contractors, expenses incurred by MassDEP in support of those direct hours, and payments to MassDEP's contractors. (For more detail on cost liability, see 310 CMR 40.1200.)

MassDEP may also assess interest on costs incurred at the rate of twelve percent (12%), compounded annually. To secure payment of this debt, the Commonwealth may place liens on all property owned by a Responsible Party in the Commonwealth. To recover the debt, the Commonwealth may foreclose on these liens or the Attorney General may bring legal action against a Responsible Party.

In addition to liability for up to three (3) times all response action costs incurred by MassDEP, Responsible Parties may also be liable to the Commonwealth for damages to natural resources caused by the release. Civil and criminal liability may also be imposed under M.G.L. c. 21E, § 11, and civil administrative penalties may be imposed under M.G.L. c. 21A, § 16 for each violation of M.G.L. c. 21E, the MCP, or any order, permit or approval issued thereunder.

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Street, Apt. No., or PO Box No.	68 Jonspin Rd.
City, State, ZIP+4	Wilmington, MA 01887

PS Form 3800, June 2002

See Reverse for Instructions

Notice of Responsibility Response (RTNs: 3-24376, 3-23246, 3-24358)

November 22, 2005

November 22, 2005
Project 04516

Geotechnical
Environmental and
Water Resources
Engineering

Ms. Irene Dale
Environmental Engineer
Department of Environmental Protection
Bureau of Waste Site Cleanup
205B Lowell Street
Wilmington, MA 01887

Dear Ms. Dale:

Re: Notice of Responsibility (November 9, 2005)
50 Tufts Street
Somerville, Massachusetts
RTN 3-24376, 3-23246, 3-24358

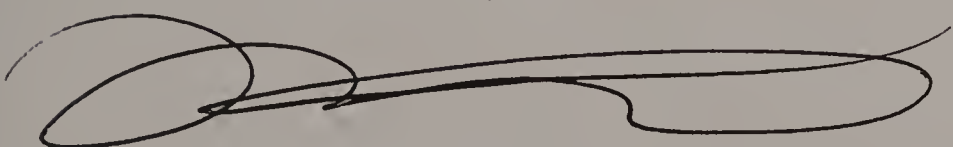
On behalf of our client, UniFirst Corporation, we are responding to the Notice of Responsibility (NOR), Notice of Need to Conduct Immediate Response Actions and Designation of Interim Deadlines, dated November 9, 2005, for the above referenced disposal site. Following up on our telephone conversation on November 17, this will confirm that UniFirst has engaged GEI Consultants, Inc. and Ileen Gladstone, as an LSP, for this project.

We have initiated an Imminent Hazard (IH) Evaluation for the property at 50 Tufts Street by requesting a review of the available files in our telephone conversation of November 17, 2005, and conducting the file review at DEP's offices on November 21, 2005. Details of the IH Evaluation and any further response to the NOR must await the results of our review of DEP's files and of the Immediate Response Action Plan which was to be submitted by Somerville Two, LLC to DEP by November 21, 2005.

If you have any questions, please do not hesitate to contact me at 781.721.4012 or igladstone@geiconsultants.com.

Sincerely,

GEI CONSULTANTS, INC.


Ileen S. Gladstone, P.E., LSP
Vice President

ISG/cc

c: Steve Aquilino, UniFirst

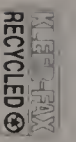
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NOV 22 2005

DEP
NORTHEAST REGIONAL OFFICE

Immediate Response Action Plan (RTNs: 3-24376, 3-
23246, 3-24358)
January 9, 2006



80000 SERIES
30% P.C.W.

January 9, 2006
Project 04516

Geotechnical
Environmental and
Water Resources
Engineering

Ms. Irene M. Dale
Environmental Engineer
Bureau of Waste Site Cleanup
Department of Environmental Protection
205B Lowell Street
Wilmington, MA 01887

Dear Ms. Dale:

**Re: Immediate Response Action Plan
50 Tufts Street
Somerville, Massachusetts
RTNs 3-23246, 3-24358, and 3-24376.**

On behalf of UniFirst (UniFirst) Corporation of Wilmington, Massachusetts, we prepared this Immediate Response Action (IRA) Plan for a release of chlorinated volatile organic compounds (VOCs) at 50 Tufts Street in Somerville, Massachusetts (the Site). This IRA Plan responds to the Notice of Responsibility, Notice of Need to Conduct IRA, and Designation of Interim Deadlines (Notice), issued by the Massachusetts Department of Environmental Protection (DEP) to UniFirst on November 9, 2005, associated with Release Tracking Numbers (RTNs) 3-23246, 3-24358, and 3-24376. The original IRA Transmittal Form (BWSC-105) is attached and a copy is included in Appendix A.

50 Tufts Street is located in a residential and commercial neighborhood in East Somerville. The Site location is shown on Fig. 1 and a Site Plan on Fig. 2.

1. CONTACT INFORMATION

Entity Undertaking the IRA
Brian Keegan
Senior Engineering Manager
UniFirst Corporation
68 Jonspin Road
Wilmington, MA 01887
978.658.8888 ext 645

Licensed Site Professional
Ileen S. Gladstone, P.E., LSP
Vice President
GEI Consultants, Inc.
1021 Main Street
Winchester, MA 01890
781.721.4012
LSP License: 9719

RECEIVED

JAN 09 2006

**DEP
NORTHEAST REGIONAL OFFICE**

2. DESCRIPTION OF RELEASE, SITE CONDITIONS, AND SURROUNDING RECEPTORS (310 CMR 40.0424[1][b])

2.1 Release Reporting

2.1.1 Release Tracking Number (RTN) 3-23246

In 2002, Mr. Francis Margaglione, a prospective purchaser of the property at 50 Tufts Street engaged Sanborn, Head & Associates (SHA) of Westford, Massachusetts, to conduct an environmental due diligence investigation. SHA performed a subsurface exploration program collecting soil and groundwater samples for laboratory analyses. SHA measured perchloroethylene (PCE), trichloroethylene (TCE) and other chlorinated VOCs in soil and groundwater samples in concentrations greater than the applicable Massachusetts Contingency Plan (MCP) reportable concentrations for soil (RCS1) and groundwater (RCGW2).

Mr. Margaglione provided the data to 50 Tufts Street, Inc, the property owner. On October 3, 2003, on behalf of 50 Tufts Street, Inc., Mr. Craig Campbell notified DEP of a release of PCE and other hazardous materials in excess of the applicable reportable concentrations. DEP issued an NOR to 50 Tufts Street, Inc. and assigned RTN 3-23246 to the release.

2.1.2 Release Tracking Number 3-24376

In August 2004, on behalf of Atlantic National Trust, LLC, GeoInsight Inc. of Westford, Massachusetts, installed four groundwater monitoring wells along the east side of Tufts Street, approximately 30 to 40 feet from the Site. PCE, TCE and 1,1,1-trichloroethane were detected in groundwater collected from each of the wells. In two of the wells located within 30 feet of residences, the concentrations of total VOCs were greater than 5 milligrams per liter (mg/l), triggering an MCP 72-hour reporting requirement.

On November 5, 2004, DEP issued an NOR to 50 Tufts Street, Inc. to conduct an IRA to evaluate the potential for a Critical Exposure Pathway (CEP) and/or a condition of Substantial Release Migration (SRM) due to the presence of VOCs in concentrations greater than 5 mg/l in the groundwater within 30 feet of occupied residences. DEP assigned RTN 3-24376 to the release.

2.1.3 Release Tracking Number 3-24358

On September 23, 2004, on behalf of Father & Son Moving & Storage, the building tenant, SHA collected a sample of indoor air from the office portion of the building at 50 Tufts Street and submitted the sample for laboratory analysis of VOCs. PCE (929 parts-per-billion-volume (ppbv)), TCE (43.5 ppbv) and related chlorinated VOCs were detected at elevated concentrations in the air sample. Based on the air testing results, SHA concluded there was a potential for an Imminent Hazard to a 40-hours per week commercial worker when evaluated over a period of five years. SHA identified the John Danais Company as the owner of the property.

On behalf of the building tenant, SHA reported the Imminent Hazard to DEP on October 22, 2004. DEP assigned RTN 3-24358 to the release. On November 16, 2004, DEP issued an NOR to the John Danais Company.

2.2 Site Conditions

50 Tufts Street is located in a residential and commercial neighborhood in East Somerville. The Site location is shown on Fig. 1. 50 Tufts Street is approximately 1.17 acres and is developed

with an approximately 18,000 square feet building (Fig 2.). The majority of the building is warehouse space and a small portion is office space. Immediately north of the building is paved parking. Southeast of the building is paved parking and a grassed hill that slopes towards Washington Street. The property is fenced.

In a memorandum dated August 7, 2002, SHA describes the Site as underlain by approximately 12 to 20 feet of silty sands overlying bedrock. The depth to bedrock was not reported. According to the Bedrock Geologic Map of Massachusetts by the U.S. Geological Survey dated 1983, the Cambridge Argillite underlies the area in the vicinity of the Property. SHA also reported the "... groundwater table is below the rock surface below the building, but above the rock on the southern end of the property..." and "...groundwater gradient in the bedrock and unconsolidated soils at the southeast end of the building is toward the south, angling toward Tufts Street."

Sanborn Maps dated 1888 through 1933 show that the Site included both residential and undeveloped lots. By 1961 a "laundry supplies" building was located on the Site, which was expanded in 1977. Several laundry supply distribution companies operated at the Site between the 1950s and 2002.

Father & Son recently occupied the building. They vacated the premises by December 31, 2004. The building has remained vacant since that time.

2.3 Surrounding Receptors

The Site is bounded by:

- Railroad tracks to the west.
- Tufts Street and residences to the east.
- Michael E. Capuano Early Childhood Center, approximately 350 feet east, beyond the residences on Tufts Street.
- A parking garage and residences to the north.
- Washington Street, on which commercial buildings are located, to the south.

According to the Massachusetts Geographical Information System (MassGIS) Bureau of Waste Site Cleanup (BWSC) map for the Boston North Quadrangle dated December 10, 2004, the Site is not located within a Potentially Productive Aquifer (PPA) and no Sole Source Aquifers, Zone II Areas, Interim Wellhead Protection Areas, Areas of Critical Environmental Concern, Sole Source Aquifers, Protected Open Spaces, or Habitats of Species of Special Concern or Endangered Species, or Fish Habitats are located within the Site.

3. DESCRIPTION OF THE IRA TO DATE (310 CMR 40.0424[1][c,d])

To date, four potentially responsible parties (PRP) have been required by DEP to conduct IRAs associated with the Site:

- John Danais Company
- 50 Tufts Street, Inc.
- Somerville Two, LLC
- UniFirst Corporation

3.1 John Danias Company

At the time SHA reported the Imminent Hazard associated with the indoor air testing data collected at 50 Tufts Street to DEP, DEP orally approved an IRA Plan to increase the ventilation in the office space and vacate the space as soon as an alternative location could be arranged. The ventilation in the office area was improved and tenants vacated the building by December 31, 2004. SHA submitted an IRA Completion Statement for RTN 3-24358 to DEP on February 2, 2005.

3.2 50 Tufts Street, Inc.

On December 21, 2004, DEP issued a Notice of Response Action – Interim Deadline (NRA) to 50 Tufts Street, Inc. to evaluate indoor air at six residences across Tufts Street and evaluate utility lines within Tufts Street for the presence of Site contaminants that may pose a condition of SRM. If IRA actions were not initiated by January 11, 2005, the DEP gave notice that it would assign a contractor to carry out response actions. 50 Tufts Street, Inc. did not undertake the required response actions.

DEP conducted an indoor air screening program at residences located at 9, 11/13, 19, 25, and 27 Tufts Street. DEP contacted residents and obtained access agreements. On February 9, 2005, DEP conducted indoor air screening for chlorinated VOCs in the basement and first floor of each residence. The only analyte detected was 0.26 ppbv of PCE from the basement of 19 Tufts Street.

In February and March 2005, DEP coordinated the sampling of indoor air for laboratory testing at the residences located at 9, 11/13, 17, 19, 23, 25, and 27 Tufts Street. Shaw Environmental & Infrastructure (Shaw) of Andover, Massachusetts, collected the samples. A four-hour time weighted average sample was collected from the basement and the first floor of each residence. Accutest Laboratories, Inc., of Marlborough, Massachusetts (Accutest), analyzed the samples for VOCs by US EPA Method TO-15. PCE was detected in air samples from all of the residences except 27 Tufts Street. PCE concentrations ranged from 0.14 ppbv to 1.3 ppbv, with the highest concentration detected in a sample collected at 17 Tufts Street. All concentrations reported were below DEP published concentrations for PCE in residences.

3.3 Somerville Two, LLC

Somerville Two, LLC is the current owner of 50 Tufts. On June 9, 2005, DEP issued a Notice of Need to Conduct IRA to Somerville Two. DEP had determined that based on the indoor air sampling results, a condition of SRM existed at the Site and that Somerville Two needed to conduct response actions necessary to abate the SRM. DEP required Somerville Two to repair and seal the basement floor of 17 Tufts Street and eliminate pathways through openings in the walls.

Somerville Two responded that the indoor air testing results did not represent a condition of SRM, since the results were less than DEP published background concentrations for PCE in residences. DEP responded that, although concentrations were below published background concentrations, the concentrations of PCE measured in 17 and 19 Tufts Street relative to those in the other nearby residences nonetheless constituted an SRM. DEP therefore directed Somerville Two to undertake an IRA.

On September 6, 2005, GeoInsight submitted an IRA Plan to DEP to repair and seal the basement floor and portions of the wall at 17 Tufts Street. During September, GeoInsight repaired

damaged areas of the concrete floor and wood paneling at 17 Tufts Street. A concrete latex-based sealer was applied to newly repaired sections of floor and those portions of the floor that were not recently painted by the owner.

On October 11, 2005, GeoInsight submitted an IRA Plan and Completion Statement to DEP. The Completion Statement concluded that response actions were completed since the potential Critical Exposure Pathways (broken concrete floor, utility manways and foundation cracks) were sealed. The Completion Report also reiterated that the concentrations of chlorinated VOCs from 17 Tufts Street were below published DEP background concentrations.

On October 20, 2005, DEP issued a Notice of Immediate Response Action Completion (IRAC) Statement Denial; Notice of Need to Conduct IRA; and Designation of Interim Deadline to Somerville Two. DEP did not consider the IRA complete since the entire basement floor at 17 Tufts Street was not sealed and there was no monitoring plan for collecting additional indoor air samples or groundwater samples. DEP required additional response actions of Somerville Two including technical justification for the continued use of DEP published background data or removal of its reference from the Report, sealing the remainder of the basement floor at 17 Tufts Street, a groundwater monitoring program for the wells along Tufts Street, and an indoor air sampling program for the residences at 17 and 19 Tufts Street.

3.4 UniFirst Corporation

On November 9, 2005, DEP issued a Notice of Responsibility, Notice of Need to Conduct IRA, and Designation of Interim Deadlines (Notice) to UniFirst Corporation to conduct an Imminent Hazard Evaluation (IHE) at 50 Tufts Street, to establish a monitoring plan for seven Tufts Street residences, and to evaluate potential impacts to other receptors.

4. IRA OBJECTIVES, PLAN, AND SCHEDULE (310 CMR 40.0424[1][e])

4.1 IRA Objectives

The objectives of the IRA, based on the Notice, are:

- Evaluate whether or not an Imminent Hazard exists at 50 Tufts Street.
- Conduct quarterly indoor air monitoring at 17 and 19 Tufts Street at which remedial work has been conducted.
- Conduct indoor air monitoring at additional residences along Tufts Street.
- Evaluate the extent of the shallow groundwater plume.
- Evaluate the utilities as a potential migration pathway.
- Evaluate the potential for impact to additional receptors.

To expedite actions responsive to the Notice, this IRA Plan has been prepared to address each of DEP's annunciated objectives. UniFirst, however, does not concede that there is presently an Imminent Hazard or SRM.

Indoor air monitoring will be undertaken consistent with the United States Environmental Protection Agency's "Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils," dated November 29, 2002, and DEP's "Indoor Air Sampling And Evaluation Guide," WSC Policy #02-403, dated April 2002.

4.2 Planned IRA Activities

4.2.1 *Imminent Hazard Evaluation*

On November 22, 2005, on behalf of UniFirst, GEI submitted a letter responding to the Notice and initiated the Imminent Hazard evaluation for the property located at 50 Tufts Street.

An LSP opinion concluding that 50 Tufts Street is currently not occupied and that based on the current use, an Imminent Hazard does not exist, was submitted to DEP on January 9, 2006.

4.2.2 *Indoor Air Monitoring, 17 and 19 Tufts Street*

GEI will conduct indoor air monitoring at 17 and 19 Tufts Street, after obtaining access agreements from the property owners. We will plan to collect samples quarterly for one year. Samples will be collected from the first floor and basement of each residence.

Each indoor air sample will be collected over a 4-hour period in a SUMMA® canister and will be analyzed by US EPA Method TO-15. Prior to sampling, we will inventory VOC-containing materials in the residences and, to the extent possible, remove the materials containing VOCs.

4.2.3 *Indoor Air Monitoring, Other Tufts Street Residences*

GEI will conduct indoor air monitoring at 9, 11/13, 23, 25, and 27 Tufts Street, after obtaining access agreements from the property owners. We will plan to conduct sampling semi-annually for one year. Samples will be collected from the first floor and basement of each residence.

Each indoor air sample will be collected over a 4-hour period in a SUMMA® canister and will be analyzed by US EPA Method TO-15. Prior to sampling, we will inventory VOC-containing materials in the residences and, to the extent possible, remove the materials containing VOCs.

4.2.4 *Evaluate Utility Lines*

GEI will review available plans for underground utilities, particularly on Tufts Street, and observe field conditions to evaluate whether underground utilities may be preferential migration pathways. Access to the utility lines will depend on receiving authorization from the city of Somerville.

4.2.5 *Soil Borings and Monitoring Well Installation*

GEI will engage a drilling subcontractor to install up to six monitoring wells at the Site using a Geoprobe® drilling rig at approximately the locations identified on Fig. 2. Soil samples will be screened during drilling and selected soil samples may be submitted for VOC testing by EPA Method 8260. We anticipate installing the wells on public property (e.g., sidewalks and roads). We will apply for a Grant of Location from the city, followed by a street opening permit.

4.2.6 *Groundwater*

We will collect groundwater samples from the newly installed monitoring wells and selected existing wells and submit the groundwater for laboratory testing of VOCs by EPA Method 8260. After the first round of sampling, we will collect samples quarterly at selected wells and submit the groundwater samples for laboratory testing by EPA Method 8260. We will survey the existing and newly installed wells and measure depths to groundwater to evaluate flow direction.

5. SCHEDULE

IRA activities are scheduled to begin in January 2006 in accordance with the schedule shown below (pending access authorizations and applicable city permits). We will submit the first IRA status report 120 days after the submission of this IRA Plan. We will submit IRA status reports every six months thereafter, until an IRA Completion report is submitted to DEP.

IRA Activity	Schedule
Imminent Hazard Evaluation	Completed
Indoor Air Monitoring, 17 & 19 Tufts Street	Quarterly (Feb, May, Aug, Nov. 2006)
Indoor Air Monitoring, Other Tufts Street Residences	Semi-Annual (Feb. and Nov. 2006)
Soil Borings & Monitoring Well Installations	February 2006
Groundwater Sampling	Quarterly (Feb, May, Aug, Nov. 2006)
Utility Line Evaluation	March 2006
IRA Status Report #1	April 2006

6. REMEDIATION WASTE MANAGEMENT

VOC-contaminated soil and groundwater may be generated as a result of drilling activities. The wastes will be collected into drums and will be appropriately managed and disposed.

7. ENVIRONMENTAL MONITORING PLAN AND PERMITS

As required by the Occupational Safety and Health Administration (OSHA), we will prepare a site-specific Health and Safety Plan for drilling and groundwater sampling. Other measures to ensure on-site safety will be taken as appropriate (i.e., police details for work in or near public roadways as required).

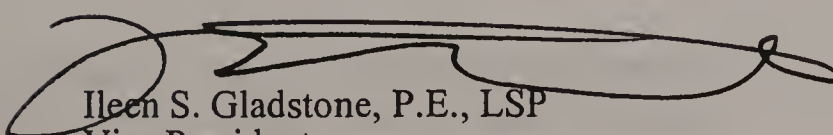
We will obtain access agreements with the residents along Tufts Street to collect indoor air samples at their homes.

We will obtain a Grant of Location and street opening permits as required by the city of Somerville to install groundwater monitoring wells in the public way.

Please contact me at 781.721.4012 or igladstone@geiconsultants.com if you have any questions.

Sincerely,

GEI CONSULTANTS, INC.

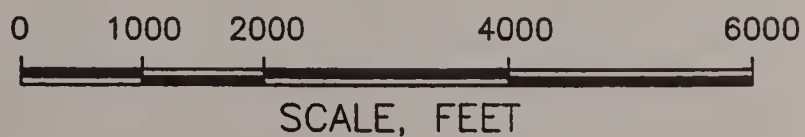


Ileen S. Gladstone, P.E., LSP
Vice President

MCE/ISG:cc

Attachments

c: UniFirst
Goodwin Procter



This Image provided by MassGIS is taken from
 U.S.G.S. Topographic 7.5 X 15 Minute Series
 Boston North, MA Quadrangle, 1985.
 Datum is National Geodetic Vertical Datum (NGVD).
 Contour Interval is 3 Meters.



Immediate Response Action Plan
 50 Tufts Street
 Somerville, Massachusetts
 UniFirst Corporation
 Wilmington, Massachusetts



SITE LOCATION MAP

Project 045160

January 2006

Fig. 1

LEGEND

LOCATION OF SITE

MONITORING WELLS INSTALLED UTILIZING GEOPROBE ADVANCEMENT METHODS BY ENVIRONMENTAL DRILLING, INC. OF STERLING, MASSACHUSETTS ON 6/21/02. BORING AND WELL CONSTRUCTION WERE OBSERVED AND LOGGED BY SHA PERSONNEL

BORINGS ADVANCED UTILIZING GEOPROBE ADVANCEMENT METHODS BY ENVIRONMENTAL DRILLING, INC. OF STERLING, MASSACHUSETTS ON 6/21/02. BORING AND WELL CONSTRUCTION WERE OBSERVED AND LOGGED BY SHA PERSONNEL

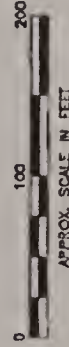
MONITORING WELLS INSTALLED UTILIZING 6" ID AUGER ADVANCEMENT METHODS BY ENVIRONMENTAL DRILLING, INC. OF STERLING, MA ON 7/3/02. BORING AND WELL CONSTRUCTION WERE OBSERVED AND LOGGED BY SHA PERSONNEL

PRE-EXISTING MONITORING WELLS FOUND ON SITE BY SHA PERSONNEL

MONITORING WELLS INSTALLED BY GEOINSIGHT PERSONNEL, AUGUST 2004.

SOIL BORINGS INSTALLED

PROPOSED SHALLOW MONITORING WELL



NOTES:

1. THIS PLAN WAS DERIVED FROM A DRAFT PLAN PREPARED BY GEOINSIGHT "SITE PLAN" DATED 8/23/04

GEO Consultants	SITE PLAN
50 Tufts Street Somerville, Massachusetts UniFirst Corporation	Project 045160 January 2006 Fig. 2

ATTACHMENT A

Immediate Response Action (IRA) Transmittal Form
(BWSC-105)



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

23246

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: _____

2. Street Address: 50 Tufts Street

3. City/Town: Somerville

4. ZIP Code: 02145

☐ 5. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.

☐ a. Tier IA ☐ b. Tier IB ☐ c. Tier IC ☐ d. Tier II

☐ 6. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):

☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management

☐ d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): _____
(mm/dd/yyyy)

☒ 2. Submit an Initial IRA Plan.

☐ 3. Submit a Modified IRA Plan of a previously submitted written IRA Plan.

☐ 4. Submit an Imminent Hazard Evaluation. (check one)

☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.

☐ b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.

☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.

☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.

☐ 5. Submit a request to Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard.

☐ 6. Submit an IRA Status Report.

☐ 7. Submit an IRA Completion Statement.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

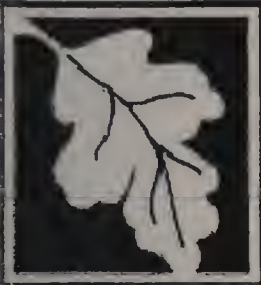
b. Provide Release Tracking Number of Tier Classified Site (Primary RTN):

-

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 8. Submit a Revised IRA Completion Statement.

(All sections of this transmittal form must be filled out unless otherwise noted above)



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

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23246

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- ☒ a. Air ☒ b. Basement ☒ c. Critical Exposure Pathway ☒ d. Groundwater ☒ e. Residence
☐ f. Paved Surface ☐ g. Private Well ☐ h. Public Water Supply ☐ i. School ☐ j. Sediments
☐ k. Soil ☐ l. Storm Drain ☐ m. Surface Water ☐ n. Unknown ☐ o. Wetland ☐ p. Zone 2
☐ q. Others Specify: _____

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- ☐ a. Oils ☒ b. Chlorinated Solvents ☐ c. Heavy Metals
☐ d. Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|--|---|
| ☒ 1. Assessment and/or Monitoring Only | ☐ 2. Temporary Covers or Caps |
| ☐ 3. Deployment of Absorbent or Containment Materials | ☐ 4. Temporary Water Supplies |
| ☐ 5. Structure Venting System | ☐ 6. Temporary Evacuation or Relocation of Residents |
| ☐ 7. Product or NAPL Recovery | ☐ 8. Fencing and Sign Posting |
| ☐ 9. Groundwater Treatment Systems | ☐ 10. Soil Vapor Extraction |
| ☐ 11. Bioremediation | ☐ 12. Air Sparging |
| ☐ 13. Excavation of Contaminated Soils | |

- ☐ a. Re-use, Recycling or Treatment ☐ i. On Site Estimated volume in cubic yards _____
☐ ii. Off Site Estimated volume in cubic yards _____

ii. Receiving Facility: _____ Town: _____ State: _____

ii. Receiving Facility: _____ Town: _____ State: _____

iii. Describe: _____

- ☐ b. Store ☐ i. On Site Estimated volume in cubic yards _____
☐ ii. Off Site Estimated volume in cubic yards _____

ii. Receiving Facility: _____ Town: _____ State: _____

ii. Receiving Facility: _____ Town: _____ State: _____

Date	Description	Amount	Balance	Remarks
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Jan 1	Balance forward			
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**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM**

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

23246

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

☐ c. Landfill

☐ i. Cover Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ ii. Disposal Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ 14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 15. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 16. Other Response Actions:

Describe: _____

☐ 17. Use of Innovative Technologies:

Describe: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

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23246

E. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 9719

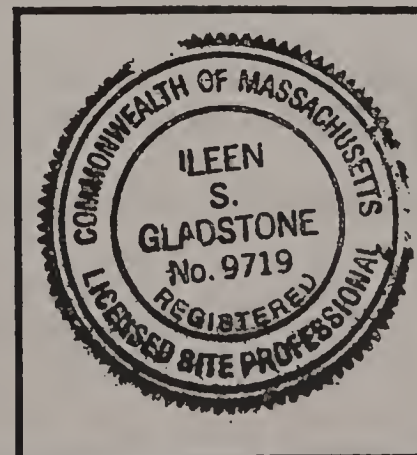
2. First Name: Ileen S. 3. Last Name: Gladstone

4. Telephone: (781) 721-4012 5. Ext.: 6. FAX: (781) 721-4073

7. Signature: _____

8. Date: _____
(mm/dd/yyyy)

9. LSP Stamp:







Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 23246

F. PERSON UNDERTAKING IRA:

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: UniFirst Corporation
3. Contact First Name: Brian 4. Last Name: Keegan
5. Street: 68 Jonspin Road 6. Title: Senior Engineering Manager
7. City/Town: Wilmington 8. State: MA 9. ZIP Code: 01887
10. Telephone: (978) 658-8888 11. Ext.: 645 12. FAX: _____

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
- ☒ e. Other RP or PRP Specify: corporate affiliation with previous owner of property
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking IRA Specify Relationship: _____

H. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
- ☐ a. A Release Abatement Measure (RAM) Plan (BWSC106) ☐ b. Phase IV Remedy Implementation Plan (BWSC108)
- ☐ 2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 5. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to the DEP Regional Office.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

23246

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

1. I, Brian Keegan, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By:

Brian E Keegan
Signature

3. Title:

Senior Engineering Manager

4. For:

UniFirst Corporation

5. Date:

1/6/06

(Name of person or entity recorded in Section F)

(mm/dd/yyyy)

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section F.

7. Street:

8. City/Town:

9. State:

10. ZIP Code:

11. Telephone:

12. Ext.:

13. FAX:

**YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY
RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU
MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.**

Date Stamp (DEP USE ONLY:)

Imminent Hazard Evaluation (RTN 3-23246 and 3-24358)

January 9, 2006

January 9, 2006
Project 04516

Ms. Irene M. Dale
Environmental Engineer
Bureau of Waste Site Cleanup
Department of Environmental Protection
205B Lowell Street
Wilmington, MA 01887

RECEIVED

Dear Ms. Dale:

JAN 09 2006

Re: **Imminent Hazard Evaluation**
50 Tufts Street
Somerville, Massachusetts
RTN 3-23246 and 3-24358

DEP
NORTHEAST REGIONAL OFFICE

On behalf of UniFirst Corporation of Wilmington, Massachusetts, we prepared this Imminent Hazard Evaluation (IHE) to evaluate conditions associated with a release of chlorinated volatile organic compounds (VOCs) at 50 Tufts Street in Somerville, Massachusetts (the Property).

The original Massachusetts Department of Environmental Protection (DEP) Transmittal Form (BWSC-105) is being submitted with this Imminent Hazard Evaluation, and a copy of the Transmittal Form is attached.

Background

In 2002, as part of an environmental due diligence investigation, Sanborn, Head & Associates (SHA) of Westford, Massachusetts, conducted a subsurface exploration program at the Property, collecting soil and groundwater samples for laboratory analyses. SHA measured perchloroethylene (PCE), trichloroethylene (TCE) and other chlorinated VOCs in soil and groundwater samples in concentrations greater than the applicable Massachusetts Contingency Plan (MCP) reportable concentrations for soil (RCS1) and groundwater (RCGW2).

On October 3, 2003, the Massachusetts Department of Environmental Protection (DEP) was notified of a release of PCE and other hazardous materials in excess of the applicable reportable concentrations. DEP issued 50 Tufts Street, Inc, the Property owner, a Notice of Responsibility (NOR) and assigned the Site Release Tracking Number (RTN) 3-23246.

On September 23, 2004, SHA collected a sample of indoor air from the office portion of the building on the Property and submitted the sample for laboratory analysis of VOCs. PCE (929 parts-per-billion-volume (ppbv)), TCE (43.5 ppbv) and related chlorinated VOCs were detected at elevated concentrations in the air sample. At the time sampling was conducted, substantial quantities of chemicals were stored in the building in drums, tanks and other containers. Based on the air testing results, SHA concluded there was a potential for an Imminent Hazard to a 40-hours per week commercial worker when evaluated over a period of five years.

On behalf of the building tenant, SHA reported to DEP on October 22, 2004, that it had concluded there was a potential Imminent Hazard. DEP assigned RTN 3-24358 to the release and approved an Immediate Response Action to increase the ventilation in the office space and vacate the space as

soon as an alternative location could be arranged. The ventilation in the office area was improved and tenants vacated the building on December 31, 2004. SHA submitted an IRA Completion Report on February 2, 2005.

On November 9, 2005, DEP issued a Notice of Responsibility, Notice of Need to Conduct IRA, and Designation of Interim Deadlines to UniFirst Corporation for the Property. The NOR requires the opinion of a Licensed Site Professional (LSP) stating whether an Imminent Hazard exists at the Property within 60 days from the date of the NOR.

Imminent Hazard Opinion

According to the DEP Guidance for Disposal Site Risk Characterization, July 1995, an imminent hazard evaluation is "site-specific in nature and focuses on actual or likely exposures under current site conditions, given the current site uses(s) and site activities..." The imminent hazard evaluation is very narrow in scope and it only considers actual, current exposures, given current site use(s) and not foreseeable future uses(s) and exposures.

50 Tufts Street is a commercial property developed with an approximately 18,000 square feet building. The majority of the building is warehouse space and a small portion is office space. Since approximately the 1950s, laundry supply companies have operated at the Property, including Superior Products and The John Danais Company.

Most recently, Father & Son Moving & Storage, Inc. occupied the building. However, Father & Son vacated the premises before January 1, 2005.

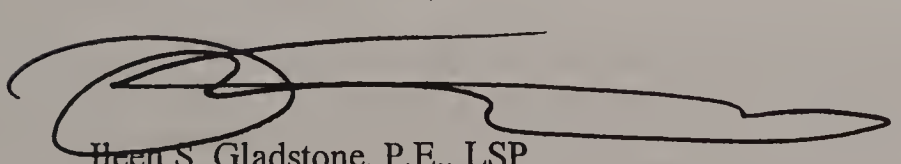
The Property is currently vacant. Mr. Mark Ensign and Ms. Ileen Gladstone, P.E., LSP, of GEI visited the Property on December 7, 2005, and observed the interior of the building. No indication of current occupants in the building at the Property was observed.

Currently there are no occupants of the building and no human receptors. Therefore, based on the current Property use, an Imminent Hazard does not exist at 50 Tufts Street.

If you need any additional information, please feel free to contact me at (781) 721.4012 or at igladstone@geiconsultants.com.

Sincerely,

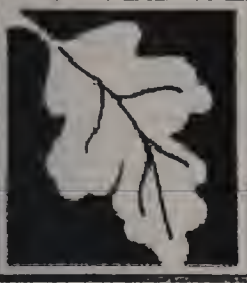
GEI CONSULTANTS, INC.



Ileen S. Gladstone, P.E., LSP
Vice President

ISG:cc

c: UniFirst
Goodwin Procter



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

23246

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: _____

2. Street Address: 50 Tufts Street

3. City/Town: Somerville

4. ZIP Code: 02145

☐ 5. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.

☐ a. Tier IA ☐ b. Tier IB ☐ c. Tier IC ☐ d. Tier II

☐ 6. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):

☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management

☐ d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): _____
(mm/dd/yyyy)

☐ 2. Submit an **Initial IRA Plan**.

☐ 3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.

☒ 4. Submit an **Imminent Hazard Evaluation**. (check one)

☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.

☒ b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.

☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.

☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.

☐ 5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.

☐ 6. Submit an **IRA Status Report**.

☐ 7. Submit an **IRA Completion Statement**.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN):

-

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 8. Submit a **Revised IRA Completion Statement**.

(All sections of this transmittal form must be filled out unless otherwise noted above)



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

23246

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- ☒ a. Air ☐ b. Basement ☐ c. Critical Exposure Pathway ☒ d. Groundwater ☐ e. Residence
☐ f. Paved Surface ☐ g. Private Well ☐ h. Public Water Supply ☐ i. School ☐ j. Sediments
☐ k. Soil ☐ l. Storm Drain ☐ m. Surface Water ☐ n. Unknown ☐ o. Wetland ☐ p. Zone 2
☐ q. Others Specify: _____

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- ☐ a. Oils ☒ b. Chlorinated Solvents ☐ c. Heavy Metals
☐ d. Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|--|---|
| ☒ 1. Assessment and/or Monitoring Only | ☐ 2. Temporary Covers or Caps |
| ☐ 3. Deployment of Absorbent or Containment Materials | ☐ 4. Temporary Water Supplies |
| ☐ 5. Structure Venting System | ☐ 6. Temporary Evacuation or Relocation of Residents |
| ☐ 7. Product or NAPL Recovery | ☐ 8. Fencing and Sign Posting |
| ☐ 9. Groundwater Treatment Systems | ☐ 10. Soil Vapor Extraction |
| ☐ 11. Bioremediation | ☐ 12. Air Sparging |
| ☐ 13. Excavation of Contaminated Soils | |

☐ a. Re-use, Recycling or Treatment ☐ i. On Site Estimated volume in cubic yards _____

☐ ii. Off Site Estimated volume in cubic yards _____

iiia. Receiving Facility: _____ Town: _____ State: _____

iiib. Receiving Facility: _____ Town: _____ State: _____

iiic. Describe: _____

☐ b. Store ☐ i. On Site Estimated volume in cubic yards _____

☐ ii. Off Site Estimated volume in cubic yards _____

iiia. Receiving Facility: _____ Town: _____ State: _____

iiib. Receiving Facility: _____ Town: _____ State: _____

ARTICLE

THE JOURNAL OF THE AMERICAN MEDICAL ASSOCIATION
PUBLISHED WEEKLY
CHICAGO, ILL., MAY 1, 1919
Vol. 27, No. 18

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Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - **23246**

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

☐ c. Landfill

☐ i. Cover Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ ii. Disposal Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ 14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 15. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 16. Other Response Actions:

Describe: _____

☐ 17. Use of Innovative Technologies:

Describe: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 23246

E. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 9719

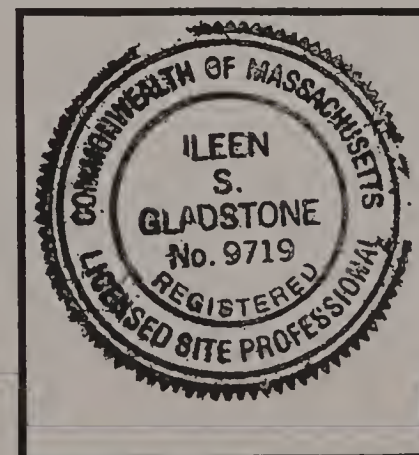
2. First Name: Ileen S. 3. Last Name: Gladstone

4. Telephone: (781) 721-4012 5. Ext.: 6. FAX: (781) 721-4073

7. Signature: 

8. Date:
(mm/dd/yyyy)

9. LSP Stamp:



Letter to City of Somerville
February 15, 2006

LETTER OF TRANSMITTAL

1021 Main Street
Winchester, MA 01890-1970
Phone: (781) 721-4000 Fax: (781) 721-4073
www.geiconsultants.com

To:	Irene Dale	Date:	February 22, 2006
	Massachusetts DEP	Project No:	04516
	205B Lowell Street	Re:	Letter to City of Somerville
	Wilmington, MA 01887		

We are sending you the following enclosures:

Quantity	Date	Description
1	2/15/06	Meeting Follow-Up Letter to Vithal Deshpande at the City of Somerville (RTNs: 3-24376, 3-23246, 3-24358)

These are transmitted as checked below:

☐ For Approval ☒ For Your Use ☐ For Review/Comment ☐ As Requested ☐ Other

Message: Irene,

Thank you for emailing Mr. Deshpande to introduce us to him. We met with Mr. Deshpande on February 10 to discuss the Tufts Street project. Attached is our meeting follow-up letter to the City of Somerville. Mr. Deshpande will be coordinating the City's involvement including a neighborhood meeting with the residents. Mr. Deshpande is working with the Mayor's and Alderman's offices to arrange this meeting, which will likely occur in early March. After the neighborhood meeting we will conduct the 1st round of air sampling. We are also working with Mr. Deshpande to obtain permits to install the monitoring wells we proposed in our IRA Plan.

Copy to:

Signed:

Ileen Gladstone

If enclosures are not as noted, kindly notify us at once.



ATTORNEY CLIENT WORK PRODUCT
PREPARED AT THE DIRECTION OF COUNSEL

Geotechnical
Environmental and
Water Resources
Engineering

February 15, 2006
Project 04516-0

Mr. Vithal V. Deshpande, Environmental Coordinator
Department of Public Works
City of Somerville
Public Works Building, 1 Franey Road
Somerville, MA 02145

Dear Mr. Deshpande:

**Re: Meeting on February 10, 2006
50 Tufts Street
Somerville, Massachusetts**

Thank you for meeting with UniFirst Corporation and GEI Consultants on February 10, 2006. As Steve Aquilino and I said, it is important to UniFirst and GEI that we establish a good communications plan and foster a cooperative and open relationship with the city and its citizens. We welcome your offer to help us facilitate communication with the city of Somerville and local residents concerning 50 Tufts Street.

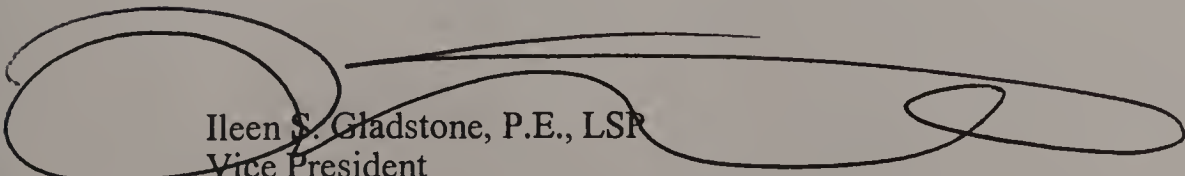
As discussed at our meeting, UniFirst recently submitted an Immediate Response Action (IRA) Plan to the Massachusetts Department of Environmental Protection to conduct indoor air testing and groundwater sampling. Although UniFirst is one of several "potentially responsible parties" identified and notified by DEP, as a result of its historical affiliation with a prior owner of 50 Tufts Street many years ago, at present UniFirst is the only party that has indicated a willingness to proceed voluntarily with the work that DEP has requested. As presented in the IRA Plan, we will be conducting two rounds of indoor air testing at 9, 11/13, 17, 19, 23, 25, and 27 Tufts Street, and four rounds of indoor air testing at 17 and 19 Tufts Street over the next year. The proposed indoor air testing is similar to previous testing conducted in the same homes. The purpose of the testing is to confirm the prior results, and to measure the effects of the renovations undertaken in the basements of two of the homes.

In addition, we will be installing additional groundwater monitoring wells near 50 Tufts Street and collecting groundwater samples for laboratory analysis.

We look forward to working with you and the residents to evaluate conditions along Tufts Street. If you have any questions please do not hesitate to contact me at 781-721-4012 or at igladstone@geiconsultants.com.

Sincerely,

GEI CONSULTANTS, INC.



Ileen S. Gladstone, P.E., LSP
Vice President

ISG:cc

N:\04516\Subsurface & Air\Deshpande 02-14-06.doc

www.geiconsultants.com

GEI Consultants, Inc.
1021 Main Street, Winchester, Massachusetts 01890-1970
781.721.4000 fax: 781.721.4073

IRA Status Report #1

May 8, 2006

SEE SEPARATELY BOUND REPORT

BWSC-105 Forms for IRA Plan & SR1 (RTN 3-24358
and RTN 3-24376)
June 26, 2006



80000 SERIES
30% P.C.W.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24358

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: Office Portion of Building

2. Street Address: 50 Tufts Street

3. City/Town: Somerville 4. ZIP Code: 02145

☐ 5. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.

☐ a. Tier IA ☐ b. Tier IB ☐ c. Tier IC ☐ d. Tier II

☐ 6. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):

☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management

☐ d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): _____
(mm/dd/yyyy)

☒ 2. Submit an **Initial IRA Plan**.

☐ 3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.

☐ 4. Submit an **Imminent Hazard Evaluation**. (check one)

☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.

☐ b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.

☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.

☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.

☐ 5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.

☐ 6. Submit an **IRA Status Report**.

☐ 7. Submit an **IRA Completion Statement**.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN):

-

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 8. Submit a **Revised IRA Completion Statement**.

(All sections of this transmittal form must be filled out unless otherwise noted above)



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24358

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- ☒ a. Air ☒ b. Basement ☒ c. Critical Exposure Pathway ☒ d. Groundwater ☒ e. Residence
☐ f. Paved Surface ☐ g. Private Well ☐ h. Public Water Supply ☐ i. School ☐ j. Sediments
☐ k. Soil ☐ l. Storm Drain ☐ m. Surface Water ☐ n. Unknown ☐ o. Wetland ☐ p. Zone 2
☐ q. Others Specify: _____

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- ☐ a. Oils ☒ b. Chlorinated Solvents ☐ c. Heavy Metals
☐ d. Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|--|---|
| ☒ 1. Assessment and/or Monitoring Only | ☐ 2. Temporary Covers or Caps |
| ☐ 3. Deployment of Absorbent or Containment Materials | ☐ 4. Temporary Water Supplies |
| ☐ 5. Structure Venting System | ☐ 6. Temporary Evacuation or Relocation of Residents |
| ☐ 7. Product or NAPL Recovery | ☐ 8. Fencing and Sign Posting |
| ☐ 9. Groundwater Treatment Systems | ☐ 10. Soil Vapor Extraction |
| ☐ 11. Bioremediation | ☐ 12. Air Sparging |
| ☐ 13. Excavation of Contaminated Soils | |

☐ a. Re-use, Recycling or Treatment ☐ i. On Site Estimated volume in cubic yards _____

☐ ii. Off Site Estimated volume in cubic yards _____

ii.a. Receiving Facility: _____ Town: _____ State: _____

ii.b. Receiving Facility: _____ Town: _____ State: _____

iii. Describe: _____

☐ b. Store ☐ i. On Site Estimated volume in cubic yards _____

☐ ii. Off Site Estimated volume in cubic yards _____

ii.a. Receiving Facility: _____ Town: _____ State: _____

ii.b. Receiving Facility: _____ Town: _____ State: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24358

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

☐ c. Landfill

☐ i. Cover Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ ii. Disposal Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ 14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 15. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 16. Other Response Actions:

Describe: _____

☐ 17. Use of Innovative Technologies:

Describe: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

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24358

E. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

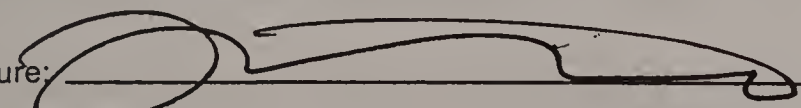
> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 9719

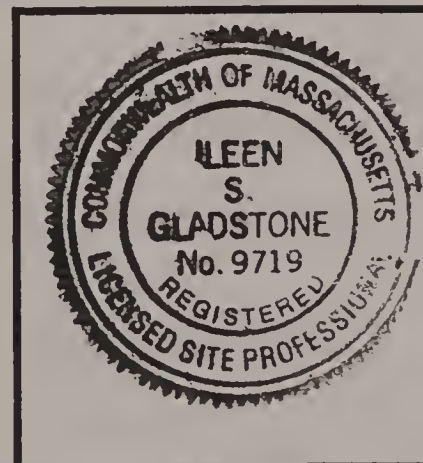
2. First Name: Ileen S. 3. Last Name: Gladstone

4. Telephone: (781) 721-4012 5. Ext.: 6. FAX: (781) 721-4073

7. Signature: 

8. Date: 6/26/06
(mm/dd/yyyy)

9. LSP Stamp:





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 24358

F. PERSON UNDERTAKING IRA:

1. Check all that apply: ☒ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: UniFirst Corporation
3. Contact First Name: Brian 4. Last Name: Keegan
5. Street: 68 Jonspin Road 6. Title: Senior Engineering Manager
7. City/Town: Wilmington 8. State: MA 9. ZIP Code: 01887
10. Telephone: (978) 658-8888 11. Ext.: 645 12. FAX: _____

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
- ☒ e. Other RP or PRP Specify: corporate affiliation with previous owner of property
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking IRA Specify Relationship: _____

H. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
- ☐ a. A Release Abatement Measure (RAM) Plan (BWSC106) ☐ b. Phase IV Remedy Implementation Plan (BWSC108)
- ☐ 2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 5. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to the DEP Regional Office.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

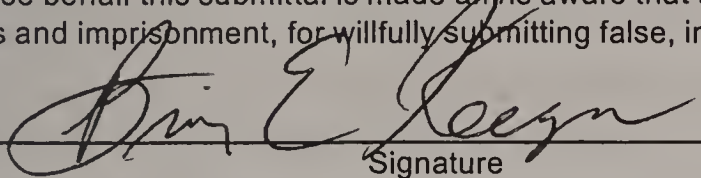
**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 24358

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

1. I, Brian Keegan, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By:  3. Title: Senior Engineering Manager
Signature

4. For: UniFirst Corporation 5. Date: 6/2/06
(Name of person or entity recorded in Section F) (mm/dd/yyyy)

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section F.

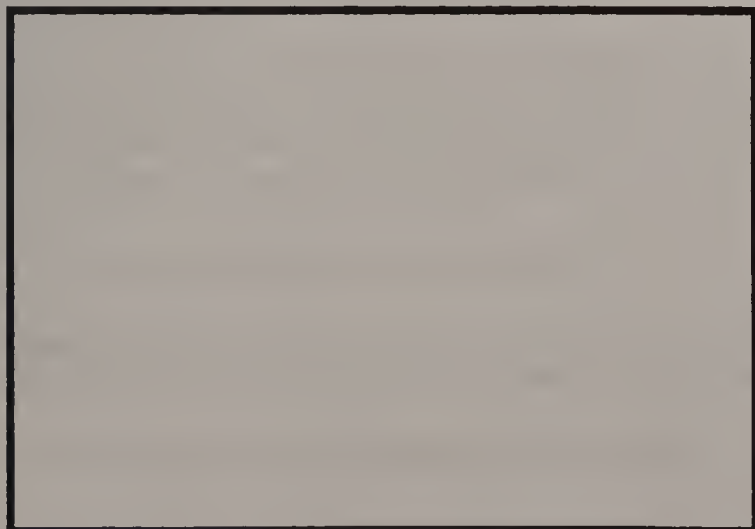
7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. FAX: _____

**YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY
RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU
MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.**

Date Stamp (DEP USE ONLY:)





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM**

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24376

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: _____

2. Street Address: 50 Tufts Street

3. City/Town: Somerville

4. ZIP Code: 02145

☐ 5. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.

☐ a. Tier IA ☐ b. Tier IB ☐ c. Tier IC ☐ d. Tier II

☐ 6. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):

☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management

☐ d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): _____

(mm/dd/yyyy)

☒ 2. Submit an **Initial IRA Plan**.

☐ 3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.

☐ 4. Submit an **Imminent Hazard Evaluation**. (check one)

☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.

☐ b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.

☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.

☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.

☐ 5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.

☐ 6. Submit an **IRA Status Report**.

☐ 7. Submit an **IRA Completion Statement**.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN):

-

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 8. Submit a **Revised IRA Completion Statement**.

(All sections of this transmittal form must be filled out unless otherwise noted above)



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24376

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- ☒ a. Air ☒ b. Basement ☒ c. Critical Exposure Pathway ☒ d. Groundwater ☒ e. Residence
☐ f. Paved Surface ☐ g. Private Well ☐ h. Public Water Supply ☐ i. School ☐ j. Sediments
☐ k. Soil ☐ l. Storm Drain ☐ m. Surface Water ☐ n. Unknown ☐ o. Wetland ☐ p. Zone 2
☐ q. Others Specify: _____

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- ☐ a. Oils ☒ b. Chlorinated Solvents ☐ c. Heavy Metals
☐ d. Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|--|---|
| ☒ 1. Assessment and/or Monitoring Only | ☐ 2. Temporary Covers or Caps |
| ☐ 3. Deployment of Absorbent or Containment Materials | ☐ 4. Temporary Water Supplies |
| ☐ 5. Structure Venting System | ☐ 6. Temporary Evacuation or Relocation of Residents |
| ☐ 7. Product or NAPL Recovery | ☐ 8. Fencing and Sign Posting |
| ☐ 9. Groundwater Treatment Systems | ☐ 10. Soil Vapor Extraction |
| ☐ 11. Bioremediation | ☐ 12. Air Sparging |
| ☐ 13. Excavation of Contaminated Soils | |

- ☐ a. Re-use, Recycling or Treatment ☐ i. On Site Estimated volume in cubic yards _____
☐ ii. Off Site Estimated volume in cubic yards _____

ii. Receiving Facility: _____ Town: _____ State: _____

ii. Receiving Facility: _____ Town: _____ State: _____

iii. Describe: _____

- ☐ b. Store ☐ i. On Site Estimated volume in cubic yards _____
☐ ii. Off Site Estimated volume in cubic yards _____

ii. Receiving Facility: _____ Town: _____ State: _____

ii. Receiving Facility: _____ Town: _____ State: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24376

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

☐ c. Landfill

☐ i. Cover Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ ii. Disposal Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

☐ 14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

☐ 15. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

b. Receiving Facility: _____ Town: _____ State: _____

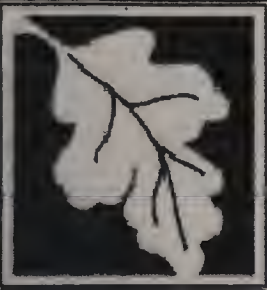
c. Receiving Facility: _____ Town: _____ State: _____

☐ 16. Other Response Actions:

Describe: _____

☐ 17. Use of Innovative Technologies:

Describe: _____



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24376

E. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 9719

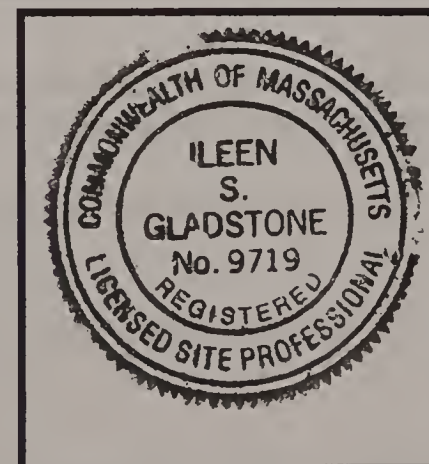
2. First Name: Ileen S. 3. Last Name: Gladstone

4. Telephone: (781) 721-4012 5. Ext.: 6. FAX: (781) 721-4073

7. Signature: 

8. Date: 6/26/06
(mm/dd/yyyy)

9. LSP Stamp:





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3

-

24376

F. PERSON UNDERTAKING IRA:

1. Check all that apply: ☒ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: UniFirst Corporation
3. Contact First Name: Brian 4. Last Name: Keegan
5. Street: 68 Jonspin Road 6. Title: Senior Engineering Manager
7. City/Town: Wilmington 8. State: MA 9. ZIP Code: 01887
10. Telephone: (978) 658-8888 11. Ext.: 645 12. FAX: _____

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
- ☒ e. Other RP or PRP Specify: corporate affiliation with previous owner of property
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking IRA Specify Relationship: _____

H. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
- ☐ a. A Release Abatement Measure (RAM) Plan (BWSC106) ☐ b. Phase IV Remedy Implementation Plan (BWSC108)
- ☐ 2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
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- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 5. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to the DEP Regional Office.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.

Section 1: Introduction

Section 2: Background

Section 3: Methodology

Section 4: Results

Section 5: Discussion

Section 6: Conclusion

Section 7: References

Section 8: Appendix

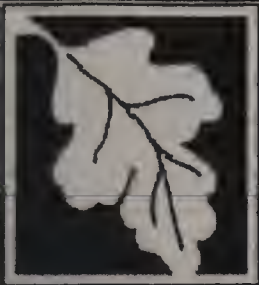
Section 9: Acknowledgments

Section 10: Contact Information

Section 11: Disclaimer

Section 12: Glossary

Section 13: Index



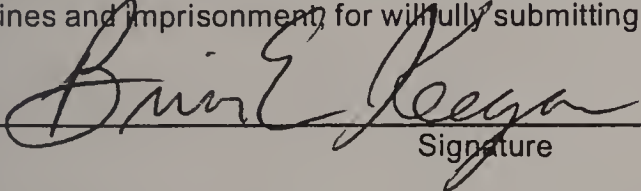
**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 24376

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

1. I, Brian Keegan, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By:  3. Title: Senior Engineering Manager
Signature

4. For: UniFirst Corporation 5. Date: 6/2/04
(Name of person or entity recorded in Section F) (mm/dd/yyyy)

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section F.

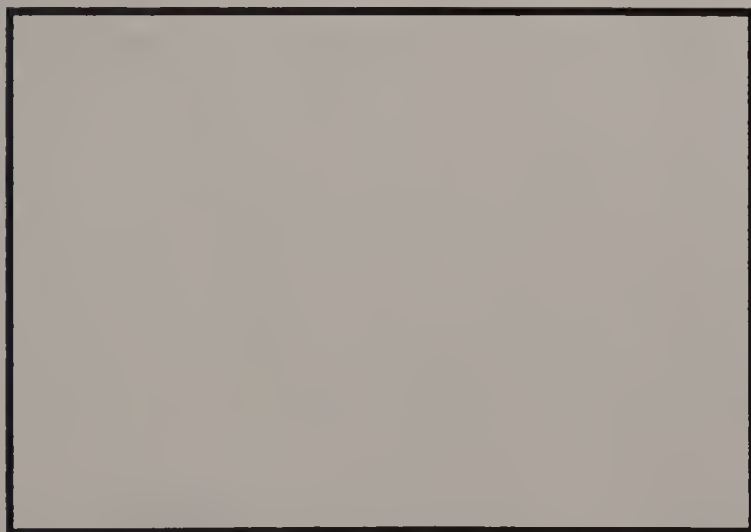
7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. FAX: _____

**YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY
RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU
MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.**

Date Stamp (DEP USE ONLY:)



Blank form with faint horizontal lines and a large rectangular box at the bottom right.

LETTER OF TRANSMITTAL

1021 Main Street
Winchester, MA 01890-1970
Phone: (781) 721-4000 Fax: (781) 721-4073
www.geiconsultants.com

To: Irene Dale

Date: June 29, 2006

DEP NERO - BWSC

Project No. 045160 TC 1003

205B Lowell Street

Re: IRA Plan and IRA Status Report
No. 1 Transmittal Forms

Wilmington, MA 01887

We are sending you the following enclosures:

No.	Type	Description
2	BWSC105	For IRA Plan for RTNs 3-24358 and 3-24376
2	BWSC105	For IRA Status Rpt No. 1 for RTNs 3-24358 and 3-24376

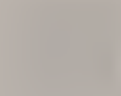
These are transmitted as checked below:

☐ For Signature ☒ For Your Use ☐ For Review/Comment ☐ As Requested ☐ Other

Copy to:

Signed: Leslie Lombardo

If enclosures are not as noted, kindly notify us at once.



Annual Report 2023

Our annual report provides a comprehensive overview of our company's performance over the past year. We have achieved significant milestones and are proud of the progress we have made. This report details our financial results, operational achievements, and our commitment to sustainability and social responsibility.

Category	2023	2022
Revenue	120M	110M
Profit	25M	20M
Assets	50M	45M
Liabilities	30M	25M
Equity	20M	20M

Department	2023	2022
Marketing	15M	12M
Sales	30M	28M
Operations	40M	35M
Finance	10M	8M
HR	5M	4M

Our financial performance has been strong, with revenue growth of 9% and a 25% increase in profit. This is a testament to the hard work and dedication of our entire team.

We have also made significant progress in our sustainability and social responsibility initiatives. Our carbon footprint has been reduced by 10%, and we have successfully implemented a new recycling program across all our facilities.

Our commitment to our employees is unwavering. We have invested in new training and development programs, and our employee satisfaction scores have reached an all-time high.

Looking ahead, we are confident in our ability to continue our growth and success. We will remain committed to our core values and our mission to create a better future for all.

Phase I Initial Site Investigation and Tier Classification
June 16, 2006

SEE SEPARATELY BOUND REPORT

RECYCLED 

80000 SERIES
30% P.C.M.

Interim IRA Status Report and IRA Plan Modification
June 27, 2006

SEE SEPARATELY BOUND REPORT

80000 SERIES
30% P.C.W.
RECYCLED

80000 SERIES
30% P.C.W.

Phase I/Tier Classification (RTNs: 3-24376, 3-23246,
3-24358)

July 11, 2006

80000 SERIES
30% P.C.W.
RECYCLED 

Geotechnical
Environmental and
Water Resources
Engineering

July 11, 2006
Project 04516-0

Department of Environmental Protection
Bureau of Waste Site Cleanup - Northeast Region Office
205B Lowell Street
Wilmington, MA 01887

Dear Sir or Madam:

Re: Phase I Initial Site Investigation and Tier IC Classification
50 Tufts Street
Somerville, MA
DEP RTNs 3-23246, 3-24358, and 3-24376

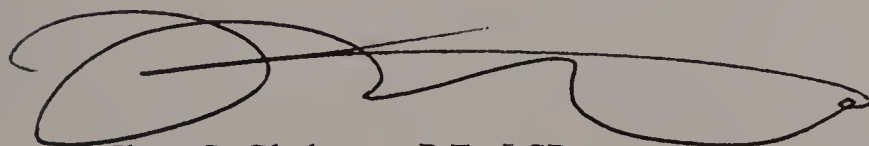
GEI Consultants, Inc. is submitting the enclosed copy of the tear sheet of the Notice of Initial Site Investigation (ISI) and Waste Site Cleanup Permit Application for the above-referenced disposal site. This notice was published on page 9 of *The Somerville Journal* on June 15, 2006.

A copy of the Phase I ISI and Tier IC Classification, together with the supporting documentation, was submitted to the DEP under separate cover.

Please contact me if you have any questions at 781.721.4012.

Very truly yours,

GEI CONSULTANTS, INC.



Ileen S. Gladstone, P.E., LSP
Vice President

LAL/ISG:lek

Enclosure

c: S. Aquilino, UniFirst
N:\04516\Final\DEP_LglNotLtr.doc

Y SIDE

SPEAKOUT: 617-776-9844

service that allows hearing-impaired individuals to communicate via a special phone service and number. "Full access for every city resident has always been a goal of the 311 program," said Curtatone. "Step by step, we've expanded 311 to embrace multiple languages and multiple access technologies. TTY service is a logical next step, and a very important one."

"In addition to expanding 311 service to an important part of our community, this addition reiterates Somerville's role as a municipal leader in innovative technologies and reinforces our city's commitment to full compliance with the Americans with Disabilities Act," said Somerville's ADA coordinator, Richard Tranfaglia.

To contact the 311 call center using the TTY function, callers should dial the toll free number, 1-866-808-4851, from their TTY device during regular business hours. TTY callers will have access to the full range of 311 information and services. All other users can continue to obtain information or make requests 24 hours a day, seven days a week by dialing 311 or visiting the 311 site on the city's Web page at ci.somerville.ma.us.

REDUCED LEGAL FEES

BANKRUPTCY
FEE \$1,000.00
TRON

SAVED 30%
FAMILY LAW CRIMINAL LAW

617.864.1227

Notice of Initial Site Investigation and Waste Site Cleanup Permit Application

50 Tufts Street, Somerville, MA

DEP Release Tracking Numbers 3-23246, 3-24358, 3-24376

Pursuant to the Massachusetts Contingency Plan (310 CMR 40.0480), an Initial Site Investigation has been performed at the above referenced location. A release of oil and/or hazardous materials has occurred at this location which is a disposal site (as defined by M.G.L. c. 21E, Section 2). This site has been classified as Tier IC (310 CMR 4010500), and an Initial Tier I C Permit Application is being submitted on June 16, 2006, to the Department of Environmental Protection (DEP) pursuant to 310 CMR 40.0703. A permit is required to proceed with Comprehensive Remedial Responses at all Tier 1 sites.

Anyone interested in reviewing the permit application should notify DEP by writing to DEP NERO, Bureau of Waste Site Cleanup, Permit Section, 205B Lowell Street, Wilmington, MA 01887 by July 6, 2006. If anyone notifies DEP of his or her interest in reviewing or submitting comment on the Tier I permit application, DEP will conduct a public comment review period of twenty (20) days which shall run concurrently with DEP's Initial Technical Review of the application. Anyone who fails to notify DEP in writing of his/her interest in commenting on the application by the above date may be deemed to have waived his/her rights, if any, to appeal DEP's permit decision or to intervene in an adjudicatory proceeding with respect to this application, pursuant to 310 CMR 40.0 0770(2).

M.G.L. c.21E and the Massachusetts Contingency Plan provide additional opportunities for public notice of and involvement in decisions regarding response actions at disposal sites: 1) The Chief Municipal Official and Board of Health of the community in which the site is located will be notified of major milestones and events, pursuant to 310 CMR 40.1403; and 2). Upon receipt of a petition from ten or more residents of the municipality in which the disposal site is located, or of a municipality potentially affected by a disposal site, a plan for involving the public in decisions regarding response actions at the site will be prepared and implemented, pursuant to 310 CMR 40.1405.

To obtain more information on this disposal site and the opportunities for public involvement during its remediation, please contact Brian Keegan, Senior Engineering Manager, UniFirst Corporation, 68 Jonspin Road, Wilmington, MA 01887 at 978.658.8888, or Ileen S. Gladstone P.E., LSP, Vice President, GEI Consultants, Inc., 1021 Main Street, Winchester, MA 01890 at 781.721.4000.

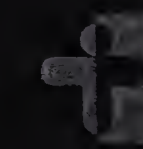
John Marcoux, MD

Expert Foot Care at our Somerville Hospital Campus

When your feet hurt, even everyday activities become uncomfortable. At our Somerville Hospital campus, our team of podiatrists can help your feet feel better so you can do the things you love to do. Services include:

- GENERAL FOOT CARE for orthotic fittings, diabetes care and other minor treatments
- EXPERT SURGICAL CARE for foot and ankle problems including bunion removal, hammer toe correction, foot reconstruction and other major foot concerns
- SPECIALIZED CARE for children and adolescents with painful flat foot conditions and other abnormalities
- MULTIDISCIPLINARY CARE for complex foot issues. Podiatric and vascular surgeons along with medical specialists treat patients with foot problems from diabetes as well as other conditions.

Have your feet checked today. Call 617-665-2555 for an appointment.



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TEACHING

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A
ISTS

UARE • 617.864.1227

Copy of Phase I/Tier Classification Copy of Public
Notice Tear Sheet sent to John Buckley, DEP
July 24, 2006

LETTER OF TRANSMITTAL

1021 Main Street
Winchester, MA 01890-1970
Phone: (781) 721-4000 Fax: (781) 721-4073
www.geiconsultants.com

To: John Buckley (978-694-3200)
DEP Northeast Regional Office

205B Lowell Street

Wilmington, MA 01887

Date: July 24, 2006

Project No: 045160

Re: Copy of Tear Sheet of Notice of
Initial Site Investigation and Waste
Site Cleanup Permit Application
RTNs 3-23246, 3-24358, 3-24376

We are sending you the following enclosures:

Quantity	Date	Description
1	7/11/06	Ltr RE: Phase I Initial Site Investigation and Tier IC Classification, 50 Tufts Street, Somerville, MA (Copy of tear sheet attached)

These are transmitted as checked below:

☐ For Approval ☐ For Your Use ☐ For Review/Comment ☒ As Requested ☐ Other

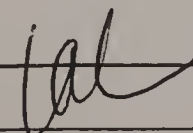
Message:

John, Attached is the copy of the tear sheet you requested.

Please call if you have any questions.

Copy to:

Signed: Leslie A. Lombardo



If enclosures are not as noted, kindly notify us at once.

July 11, 2006
Project 04516-0

Department of Environmental Protection
Bureau of Waste Site Cleanup - Northeast Region Office
205B Lowell Street
Wilmington, MA 01887

Dear Sir or Madam:

Re: Phase I Initial Site Investigation and Tier IC Classification
50 Tufts Street
Somerville, MA
DEP RTNs 3-23246, 3-24358, and 3-24376

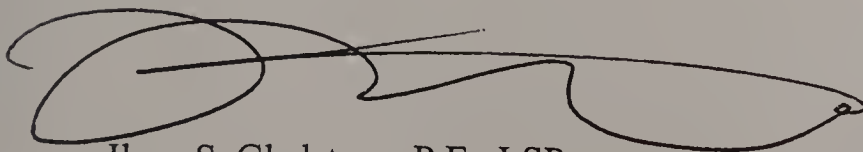
GEI Consultants, Inc. is submitting the enclosed copy of the tear sheet of the Notice of Initial Site Investigation (ISI) and Waste Site Cleanup Permit Application for the above-referenced disposal site. This notice was published on page 9 of *The Somerville Journal* on June 15, 2006.

A copy of the Phase I ISI and Tier IC Classification, together with the supporting documentation, was submitted to the DEP under separate cover.

Please contact me if you have any questions at 781.721.4012.

Very truly yours,

GEI CONSULTANTS, INC.



Ileen S. Gladstone, P.E., LSP
Vice President

LAL/ISG:lek

Enclosure

c: S. Aquilino, UniFirst
N:\04516\Final\DEP_LgI\NotLtr.doc

SPEAKOUT: 617-776-9844

To contact the 311 call center using the TTY function, callers should dial the toll free number 1-866-808-4851, from their TTY device during regular business hours. TTY callers will have access to the full range of 311 information and services. All other users can continue to obtain information or make requests 24 hours a day, seven days a week by dialing 311 or visiting the 311 site on the city's Web page at ci.somerville.ma.us.

with any other offer or discount.

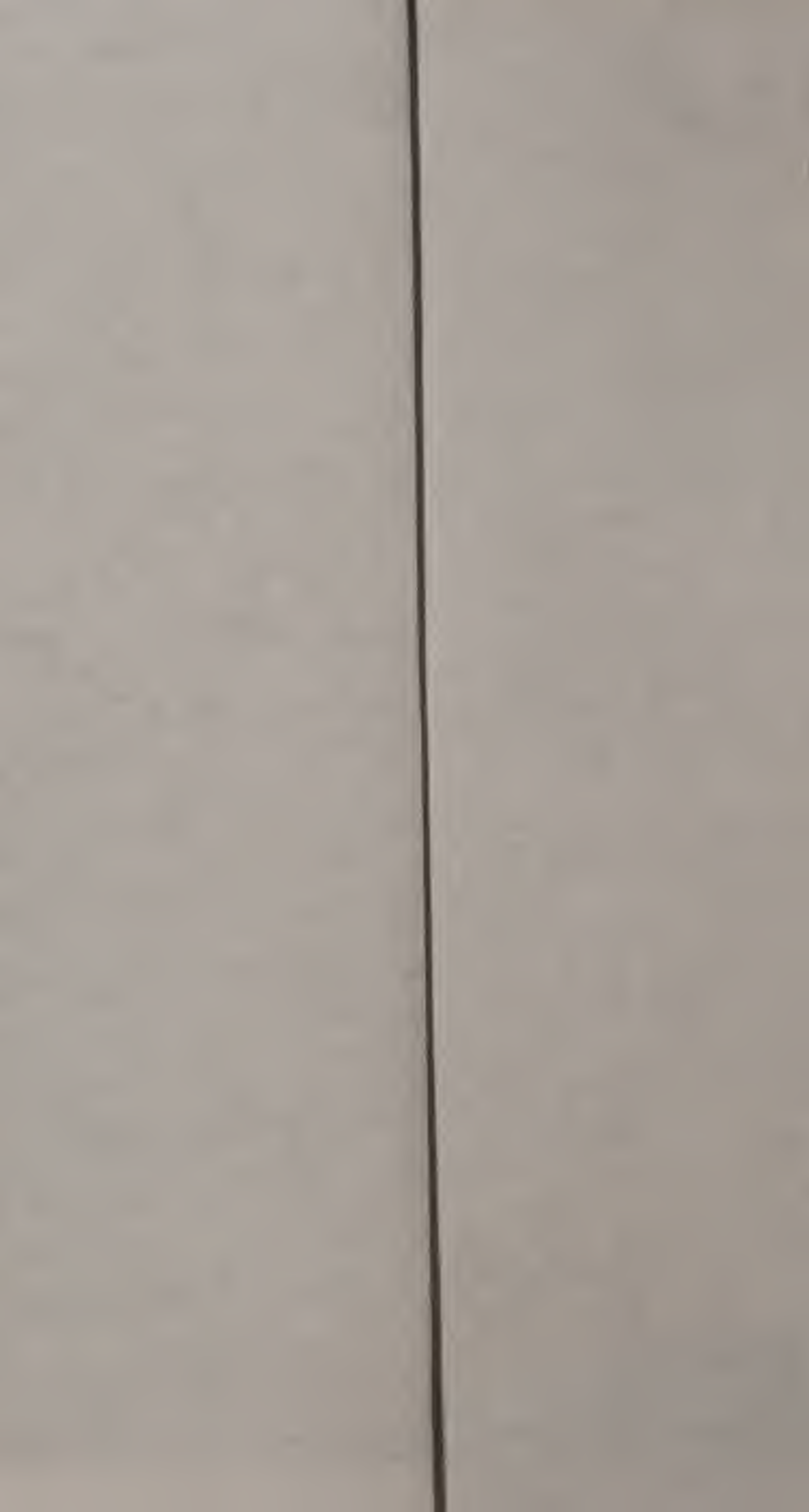
REDUCED LEGAL FEES

To obtain more information on this disposal site and the opportunities for public involvement during its remediation, please contact Brian Keegan, Senior Engineering Manager, UniFirst Corporation, 68 Jonspin Road, Wilmington, MA 01887 at 978.658.8888, orileen S. Gladstone P.E., LSP, Vice President, GEL Consultants, Inc., 1021 Main Street, Winchester, MA 01890 at 781.721.4000.

may be against him. Hebekey, chairman of the old chief of police other damages. It is their chun

John Marcoux, MD





Recovery of Response Action Costs (RTN: 3-24376)
August 17, 2006



COMMONWEALTH OF MASSACHUSETTS
 EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

MITT ROMNEY
 Governor

KERRY HEALEY
 Lieutenant Governor

STEPHEN R. PRITCHARD
 Secretary

ROBERT W. GOLLEDGE, Jr.
 Commissioner

August 17, 2006

50 Tufts Street, Inc.
 Mr. Craig Campbell
 28 State Street, 11th Floor
 Boston, MA 02109

Unifirst Corporation
 Mr. Ronald D. Croatti
 68 Jonspin Rd
 Wilmington, MA 01887

RTN: 3-0024376
 Release/Site City: Somerville, MA
 Release Address: 50 Tufts St
 RE: M.G.L. c. 21E, 310 CMR 40.0000
Recovery of Response Action Costs

Dear Messrs. Campbell and Croatti:

Enclosed with this letter is an invoice outlining the response action costs the Department of Environmental Protection (MassDEP) has incurred in response to the above-referenced release or threat of release of oil and/or hazardous materials. MassDEP has previously issued a Notice of Responsibility ("NOR") or other correspondence informing you of the basis for concluding that you are responsible for these costs. That prior correspondence and this letter and enclosed invoice have been issued pursuant to M.G.L. c. 21E and the Massachusetts Contingency Plan, codified at 310 CMR 40.0000 (the MCP).

MassDEP hereby informs you that the costs summarized on the enclosed invoice are due in full and payable to the Commonwealth of Massachusetts. Please consult the enclosed invoice for the payment due date and remittance instructions. In cases of multi-party liability, (i.e. when MassDEP has issued this letter and the associated invoice to more than one party) it is the responsibility of the parties involved to apportion costs among themselves.

Failure to remit payment in full may result in enforcement actions, as described in the enclosed Statement of Billing Rights and Consequences of Nonpayment. These actions include the assessment of interest on the full amount owed at a rate of one percent (1%) per month, or twelve percent (12%) per year, compounded annually, referral of this case to a professional collection agency, and potential legal

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

MassDEP on the World Wide Web: <http://www.mass.gov/dep>

Printed on Recycled Paper

proceedings against you, including the placement of liens on real and personal property in the Commonwealth of Massachusetts, and/or ultimate referral to the Massachusetts Office of the Attorney General.

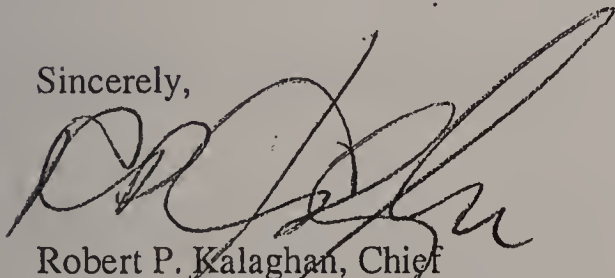
Please be advised that additional invoices will be issued for any outstanding balance (plus interest charges) that continues to exist on this account, including any new costs MassDEP may incur in the course of responding to this release.

Enclosed with this letter, please find:

- an Invoice for the response action costs owed for this release for this specific billable period;
- Supporting documentation for MassDEP's contractor charges incurred during this specific billable period;
- A Report entitled Timeslip Detail which summarizes MassDEP's staff charges incurred during this specific billable period;
- a Statement of Billing Rights and Consequences of Nonpayment for the Recovery of Costs explaining your opportunities for questioning or disputing the accuracy of the enclosed invoice, and/or requesting a payment plan; and,
- a Federal Tax Identification Number (FEIN)/Social Security Number (SSN) Verification Form which should be completed and returned with your payment to ensure proper crediting of your account.

Should you have any questions concerning this invoice or the enclosed documents, please contact the Department of Environmental Protection, Bureau of Waste Site Cleanup, Cost Recovery, Fees & Revenue Section at (617) 292-5545.

Sincerely,



Robert P. Kalaghan, Chief
Cost Recovery, Fees & Revenue Section
MassDEP Brownfields Program
Division of Technical & Financial Support
Bureau of Waste Site Cleanup

Enclosures

Copy: File

100000000000024285248E0ECOST10140600031137240003113724VC60001568550

INVOICE

Customer Name

Page 1

UNIFIRST CORPORATION

Customer Number

Invoice Number

Notice Date

VC6000156855

00C33602RTN3X0024376

08-16-06

AR Dept BPRO

Due Date

EQE: COST

10-14-06

Amount Due

Amount Enclosed

\$31,137.24

DEPT. OF ENVIRON. PROTECTION
COMMONWEALTH MASTER LOCKBOX
P.O. Box 3982
BOSTON Massachusetts 02241-3982

Bill to:

UNIFIRST CORPORATION
68 JONSPIN RD
WILMINGTON Massachusetts 01887

Payment Method: Check ☐ Money Order ☐

☐ Please check if address has changed. Write correct address on back of stub and attach with payment

Please write Invoice No on front of check or Money Order. DO NOT MAIL CASH

Please detach the above stub and return with your remittance payable to COMMONWEALTH OF MASSACHUSETTS



Commonwealth of Massachusetts
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ORIGINAL

Page: 1

Customer Number

VC6000156855

Customer Name

Invoice Number

Notice Date

Due Date

UNIFIRST CORPORATION

00C33602RTN3X0024376

08-16-06

10-14-06

Invoice Charges

Ref Line No.	DESCRIPTION	Invoice Date	No. of Units	Unit of Measure	Unit Price	Charges/ Credit
1	YEAR ENDING 10/29/2005 COST RECOVERY	08-15-06				\$31,137.24

Credit Payments Applied

\$0.00

Total Amount Due By 10-14-06

\$31,137.24

THIS INVOICE RELATES TO THE LOCATION LISTED BELOW:

RTN: 3-24376
NO LOCATION AID
50 TUFTS ST
SOMERVILLE, MA

THIS INVOICE HAS BEEN ISSUED TO THE FOLLOWING PARTIES:

- 1) UNIFIRST CORPORATION
- 2) 50 TUFTS STREET INC

DEPARTMENT RECORDS INDICATE THAT A RELEASE OR A THREAT OF RELEASE OF OIL OR HAZARDOUS MATERIAL HAS OCCURRED AT THIS LOCATION. FURTHER, AS PROVIDED FOR IN SECTION FOUR AND FIVE OF M.G.L. C.21E AND 310 CMR 40.0000, THE DEPARTMENT INCURRED RESPONSE CONSTS IN THE COURSE OF RESPONDING TO THIS RELEASE. THE DEPARTMENT HAS DETERMINED THAT YOU ARE A PARTY RESPONSIBLE FOR THESE COSTS AS DESCRIBED IN SECTION FIVE OF M.G.L. C.21E.

TO ENSURE PROPER CREDITING, PLEASE INCLUDE YOUR FEDERAL TAX IDENTIFICATION NUMBER (FEIN) OR SOCIAL SECURTY NUMBER (SSN) ON THE VERIFICATION FORM INCLUDED WITH THE ORIGINAL INVOICE.

PLEASE CONTACT THE DEP STAFF PERSON LISTED AT THE BOTTOM OF THIS INVOICE SHOULD YOU HAVE ANY QUESTIONS.

Instructions



Commonwealth of Massachusetts
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ORIGINAL

Page : 2

THIS IS THE FIRST INVOICE ISSUED TO YOU PURSUANT TO MGL 21E, SECTION 5A & 310 CMR 40.0000. THE ENCLOSED STATEMENT OF BILLING RIGHTS AND CONSEQUENCES OF NON-PAYMENT FOR THE RECOVERY OF COSTS IS PART OF THIS ORIGINAL INVOICE. PLEASE RESPOND OR REMIT PAYMENT IMMEDIATELY TO AVOID POSSIBLE ENFORCEMENT ACTIONS AS DESCRIBED IN THAT STATEMENT.

CONTACT: ROBERT KALAGHAN

(617) 292-5545

EQE

DEP – BUREAU OF WASTE SITE CLEANUP
STATEMENT OF BILLING RIGHTS AND CONSEQUENCES OF NONPAYMENT
FOR THE RECOVERY OF RESPONSE ACTION COSTS

Full payment of the enclosed invoice must be made within forty-five (45) days of the original invoice date unless a Request for Administrative Review or Hardship Payment Plan is submitted to the Department.

REQUESTS FOR ADDITIONAL INFORMATION: If you wish to obtain documentation of the costs which appear on this invoice, please submit a *written* inquiry to the Department. The written inquiry must be made prior to the invoice due date and must include the following information:

- A. The name, address, and telephone number of the person making the request; and,
- B. The invoice number as it appears on the enclosed invoice, the Department's release tracking number, and the location of the release; including the town or city.

All requests for additional information should be sent to the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup - Cost Recovery Section, One Winter Street, 7th Floor, Boston, MA 02108.

REQUESTS FOR ADMINISTRATIVE REVIEW: If you disagree with the reasonableness or appropriateness of particular cost item(s) contained in the amount due on this invoice, you may, pursuant to 310 CMR 40.1220(3), request an Administrative Review of those cost item(s).

If you wish to request an Administrative Review of particular cost item(s), submit a *written* request to the Department. The written request must be made prior to the invoice due date and must include the following information:

- A. The name, address, and telephone number of the person making the request;
- B. The invoice number as it appears on the enclosed invoice, the Department's release tracking number, and the location of the release, including town or city;
- C. Identification of the particular cost item(s) in question; and,
- D. The reason for the requested review of said item(s), as well as any documentation which supports this reason.

(Please be advised that Requests for Administrative Review that do not contain a specific, concrete, and reasonable basis for disputation will not be considered for an Administrative Review.)

No action will be taken to recover cost item(s) that are under Administrative Review until the Department reaches a decision regarding that review. Payments due as a result of an Administrative Review decision shall be due within thirty (30) days of the decision date. All of those cost item(s) not under Administrative Review, however, remain subject to all other recovery provisions discussed in this statement, this invoice, M.G.L. c. 21E and 310 CMR 40.0000.

All requests for Administrative Review should be sent to the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup - Cost Recovery Section, One Winter Street, 7th Floor, Boston, MA 02108.

REQUESTS FOR HARDSHIP PAYMENT PLAN: You may request to extend the time for making full payment of the outstanding response costs without incurring interest by submitting, *in writing*, a Request for a Hardship Payment Plan. If your Hardship Payment Plan Request is received before the invoice due date, no

DEP – BUREAU OF WASTE SITE CLEANUP
STATEMENT OF BILLING RIGHTS AND CONSEQUENCES OF NONPAYMENT
FOR THE RECOVERY OF RESPONSE ACTION COSTS

interest will be incurred pending the Department's decision. If your request is received after the invoice becomes due, interest will begin to accrue on the due date. The Request for a Hardship Payment Plan should include:

- A. The name, address, and telephone number of the person making the request;
- B. The invoice number, amount due and due date as shown on the enclosed invoice, the Department's release tracking number, and, the location of the release, including town or city;
- C. A statement of the specific circumstances you believe constitute a *severe* financial hardship; and,
- D. A proposed schedule for making payment, and the reasons you believe the proposed schedule appropriate.

After review by the Department, a written payment plan determination will be issued to you.

All Hardship Payment Plan Requests should be sent to the Massachusetts Department of Environmental Protection, Bureau of Waste Site Cleanup - Cost Recovery Section, One Winter Street, 7th Floor, Boston, MA 02108.

CONSEQUENCES OF NONPAYMENT OR LATE PAYMENT: If payment is not made, or payment is made late, this account may be subject to:

- A. Interest calculated at twelve (12) percent per annum, compounded annually [310 CMR 40.1220(4)];
- B. Referral for authorized actions by a collection agency;
- C. The placement of liens on all of your real and personal property within the Commonwealth [310 CMR 40.1250];
- D. The recovery of up to three times the amount due [310 CMR 40.1220(5)]; and/or,
- E. Civil and/or criminal proceedings brought by the Massachusetts Office of Attorney General.

ENFORCEMENT: Nothing in this statement shall limit the Department from taking enforcement actions it deems necessary, and as outlined in M.G.L. c. 21E and the Massachusetts Contingency Plan, codified at 310 CMR 40.0000 ("the MCP").

IRA Plan Modification No. 2

September 21, 2006

SEE SEPARATELY BOUND REPORT



80000 SERIES
30% P.C.W.

Retraction of Imminent Hazard Notification (RTN: 3-
26114)

September 21, 2006

SEE SEPARATELY BOUND REPORT

Release Notification and Response to Retraction Denial
Letter (RTN: 3-26114)
November 10, 2006

RECYCLED ♻️

80000 SERIES
30" P C W



UniFirst Corporation
68 Jonspin Road
Wilmington, MA 01887
Phone: 978- 658-8888
Fax: 978- 988-1305

November 10, 2006
Project 04516-2

Ms. Irene M. Dale
Environmental Engineer
Bureau of Waste Site Cleanup
Department of Environmental Protection
205B Lowell Street
Wilmington, MA 01887

RECEIVED

NOV 15 2006

DEP
NORTHEAST REGIONAL OFFICE

Dear Ms. Dale:

Re: Release Notification and Response to Retraction Denial Letter
50 Tufts Street
Somerville, MA
RTN 3-26114

The purpose of this letter is to respond to the "Denial of Notification Retraction" dated October 11, 2006, from Ms. Iris Davis of the Massachusetts Department of Environmental Protection (DEP) to the UniFirst Corporation of Wilmington, Massachusetts (Retraction Denial Letter).

As described in greater detail below, UniFirst along with GEI Consultants, Inc, the environmental consultant for the site, initially reported a *potential* Imminent Hazard condition based on the results of quarterly indoor air testing associated with the Immediate Response Action (IRA, Release Tracking Number [RTN] 3-23246) for a release of chlorinated volatile organic compounds (VOCs) at 50 Tufts Street in Somerville, Massachusetts (the Property, owned by Somerville Two, LLC, 50 Portland Pier, Portland, Maine, 04101). More specifically, concentrations of tetrachloroethylene (also called perchloroethylene [PCE]) measured in indoor air at 23 and 27 Tufts Street in June 2006 were anomalously high, as compared with previous indoor air sampling conducted in the same and other nearby homes. An Imminent Hazard condition, as defined in the Massachusetts Contingency Plan (MCP), would exist if these three conditions were to be correct.

- If the anomalously high concentrations were confirmed through further testing;
- If such concentrations persisted for a continuous period of "up to five years;" and

- If the risk, calculated based on scientifically valid toxicity information that is consistent with the type and duration of exposure under evaluation, equaled either the cancer or non-cancer risk limits established in 310 CMR 40.0955(2).

When UniFirst and GEI reported the potential Imminent Hazard condition on August 1, 2006, DEP verbally approved an IRA Plan to collect additional indoor air samples at 23 and 27 Tufts Street to evaluate whether an Imminent Hazard in fact existed. PCE concentrations detected in indoor samples collected from 23 and 27 Tufts Street in August 2006 were significantly lower, and were similar to results from prior indoor air sampling.

In accordance with the approach outlined and approved by DEP, UniFirst's risk assessors, AMEC Earth & Environmental of Westford, Massachusetts (AMEC), revised their Imminent Hazard Evaluation to reflect the new data and information. AMEC determined that there was not an Imminent Hazard based on the available data. UniFirst therefore submitted a Retraction of Imminent Hazard Notification on September 21, 2006.

Despite the new indoor air data collected as part of the IRA Plan that DEP had approved, and notwithstanding DEP's prior interpretation of the applicable provisions of the MCP, in its Retraction Denial Letter DEP stated that UniFirst had provided "no information or data to support the fact that a reportable condition did not actually exist," and the retraction therefore was denied. That "no information or data" were submitted is plainly at odds with the facts. Likewise, to conclude that the anomalous results of the June 2006 sampling may be extrapolated over a five-year exposure period, without regard to each of the other sampling results collected from the same homes, would be contrary not only to sound risk assessment principles, but to the applicable provisions of the MCP as previously interpreted by DEP itself.

AMEC has met with DEP to discuss the difference in their respective risk assessment calculations. In its evaluation, AMEC gave primary consideration to DEP's recommended unit risk factor and determined that it was not derived in accordance with currently accepted scientific principles and relevant scientific information published since 1987, when DEP's unit risk factor was established. For instance, it was derived from a rodent ingestion study with PCE that was stabilized with epichlorhydrin, a known rodent carcinogen; it was based on total PCE metabolites whereas all recent studies of PCE view trichloroacetic acid formation as the appropriate dose metric; it used an approach for cross-species scaling of dose that was replaced a decade ago by federal regulatory agencies (i.e., body weight to surface area ratio of 2 to 3 ($BW^{2/3}$) approach versus $BW^{3/4}$ approach); and it assumed linearity at low doses despite the fact PCE's "mode of action" is generally recognized by the toxicology community to be genotoxicity or peroxisomal proliferation, both of which would require non-linear dose-response functions. In addition, there has been a plethora of additional toxicological work on PCE performed in the last 20 years, which render the 1987 unit risk factor outdated. Such research includes additional

4. The fourth part of the document discusses the various methods and tools used to present the results of the analysis. It includes a detailed description of the data presentation process, from identifying the key findings to the actual presentation of the results in a clear and concise manner.

5. The fifth part of the document discusses the various methods and tools used to monitor and evaluate the performance of the organization. It includes a detailed description of the performance monitoring process, from identifying the key performance indicators to the actual monitoring and evaluation of the results.

6. The sixth part of the document discusses the various methods and tools used to improve the organization's performance. It includes a detailed description of the performance improvement process, from identifying the areas for improvement to the actual implementation of the improvement measures.

7. The seventh part of the document discusses the various methods and tools used to ensure the organization's compliance with relevant laws and regulations. It includes a detailed description of the compliance process, from identifying the applicable laws and regulations to the actual implementation of the compliance measures.

8. The eighth part of the document discusses the various methods and tools used to ensure the organization's financial stability. It includes a detailed description of the financial management process, from identifying the financial goals to the actual implementation of the financial management measures.

9. The ninth part of the document discusses the various methods and tools used to ensure the organization's operational efficiency. It includes a detailed description of the operational management process, from identifying the key operational areas to the actual implementation of the operational management measures.

10. The tenth part of the document discusses the various methods and tools used to ensure the organization's overall success. It includes a detailed description of the overall management process, from identifying the key strategic goals to the actual implementation of the overall management measures.

rodent-human comparative metabolism studies, EPA's Human Equivalent Concentration methodologies, and many comprehensive, PCE-specific, physiologically-based, pharmacokinetic models.

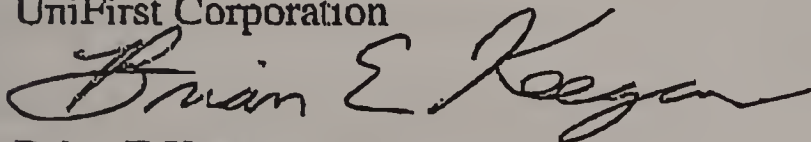
There is no dispute that there currently is no Imminent Hazard condition, because the anomalously high concentrations were not confirmed in the follow-up sampling, and the most recent concentrations measured in the residences do not result in an exposure that would constitute an Imminent Hazard. In addition, even in the absence of an Imminent Hazard, UniFirst moved forward voluntarily with the installation of air purifiers. However, the issues raised in connection with DEP's rejection – e.g., DEP's continuing use of a scientifically unsupported unit risk factor for PCE – may recur in the evaluation of risks and remedies appropriate at this site. For this reason, UniFirst wishes to continue its discussions with DEP to resolve these risk assessment issues.

In the interim, UniFirst will continue to work cooperatively with DEP to investigate and respond to RTN 3-23246. Thus, UniFirst is submitting under separate cover an IRA Plan, public notifications, and the attached Release Notification Form (BWSC-103) via eDEP, consistent with procedures that would apply if there had in fact been a reportable Imminent Hazard condition. UniFirst is undertaking these steps at DEP's request without admitting, and indeed expressly denying, that any such condition exists or existed, or that any such procedures are applicable.

The original Release Notification Form (BWSC-103) was submitted via eDEP on November 9, 2005, and a copy is included in Attachment A.

Please contact me at 978-658-8888 x 645 if you have any questions or if you wish to meet to discuss this letter.

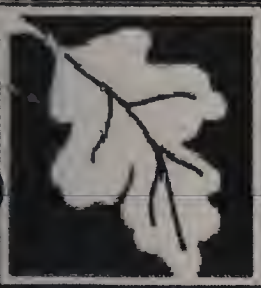
Sincerely,
UniFirst Corporation



Brian E Keegan
Senior Engineering Manager

MCE/ISG:jah
Attachments

c: Deen Gladstone, GEI
Stephen Aquilino, UniFirst Corporation
Vithal Deshpande, City of Somerville



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC103

RELEASE NOTIFICATION & NOTIFICATION
RETRACTION FORM

Release Tracking Number

3

- 26114

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: NO LOCATION AID

2. Street Address: 50 TUFTS ST

3. City/Town: SOMERVILLE

4. ZIP Code:

5. UTM Coordinates: a. UTM N: 4694322

b. UTM E: 328049

B. THIS FORM IS BEING USED TO: (check one)

- ☒ 1. Submit a Release Notification
- ☐ 2. Submit a Revised Release Notification
- ☐ 3. Submit a Retraction of a Previously Reported Notification of a release or threat of release including supporting documentation required pursuant to 310 CMR 40.0335 (Section C is not required)

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. INFORMATION DESCRIBING THE RELEASE OR THREAT OF RELEASE (TOR):

1. Date and time of Oral Notification, if applicable: 8/1/2006 Time: 11:50 ☒ AM ☐ PM
mm/dd/yyyy hh:mm

2. Date and time you obtained knowledge of the Release or TOR: 8/1/2006 Time: 10:00 ☒ AM ☐ PM
mm/dd/yyyy hh:mm

3. Date and time release or TOR occurred, if known: Time: ☐ AM ☐ PM
mm/dd/yyyy hh:mm

Check all Notification Thresholds that apply to the Release or Threat of Release:
(for more information see 310 CMR 40.0310 - 40.0315)

4. 2 HOUR REPORTING CONDITIONS

- ☐ a. Sudden Release
- ☐ b. Threat of Sudden Release
- ☐ c. Oil Sheen on Surface Water
- ☐ d. Poses Imminent Hazard
- ☒ e. Could Pose Imminent Hazard
- ☐ f. Release Detected in Private Well
- ☐ g. Release to Storm Drain
- ☐ h. Sanitary Sewer Release (Imminent Hazard Only)

5. 72 HOUR REPORTING CONDITIONS

- ☐ a. Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/2 Inch
- ☐ b. Underground Storage Tank (UST) Release
- ☐ c. Threat of UST Release
- ☐ d. Release to Groundwater near Water Supply
- ☐ e. Release to Groundwater near School or Residence
- ☐ f. Substantial Release Migration

6. 120 DAY REPORTING CONDITIONS

- ☐ a. Release of Hazardous Material(s) to Soil or Groundwater Exceeding Reportable Concentration(s)
- ☐ b. Release of Oil to Soil Exceeding Reportable Concentration(s) and Affecting More than 2 Cubic Yards
- ☐ c. Release of Oil to Groundwater Exceeding Reportable Concentration(s)
- ☐ d. Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/8 Inch and Less than 1/2 Inch



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC103

RELEASE NOTIFICATION & NOTIFICATION
RETRACTION FORM

Release Tracking Number

3 - 26114

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

C. INFORMATION DESCRIBING THE RELEASE OR THREAT OF RELEASE (TOR): (cont.)

7. List below the Oils (O) or Hazardous Materials (HM) that exceed their Reportable Concentration (RC) or Reportable Quantity (RQ) by the greatest amount.

O or HM Released	CAS Number, if known	O or HM	Amount or Concentration	Units	RCs Exceeded, if Applicable (RCS-1, RCS-2, RCGW-1, RCGW-2)
TETRACHLOROETHYLENE	127-18-4	HM	125	UG/M3	N/A

☐ 8. Check here if a list of additional Oil and Hazardous Materials subject to reporting is attached.

D. PERSON REQUIRED TO NOTIFY:

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person notifying

2. Name of Organization: UNIFIRST CORP

3. Contact First Name: BRIAN

4. Last Name: KEEGAN

5. Street: 68 JONSPIN RD

6. Title: ENV ENG MANAGER

7. City/Town: WILMINGTON

8. State: MA

9. ZIP Code: 01887-0000

10. Telephone: 8003477888

11. Ext.:

12. FAX:

☐ 13. Check here if attaching names and addresses of owners of properties affected by the Release or Threat of Release, other than an owner who is submitting this Release Notification (required).

E. RELATIONSHIP OF PERSON TO RELEASE OR THREAT OF RELEASE:

☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter

☒ e. Other RP or PRP Specify: PRP GENERIC OR NON-SPECIFIED

☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ 4. Any Other Person Otherwise Required to Notify Specify Relationship:



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC103

RELEASE NOTIFICATION & NOTIFICATION
RETRACTION FORM

Release Tracking Number

3

-

26114

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

F. CERTIFICATION OF PERSON REQUIRED TO NOTIFY:

1. I, **BRIAN KEEGAN**, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: **BRIAN KEEGAN**

Signature

3. Title: **ENV ENG MANAGER**

4. For: **UNIFIRST CORP**

(Name of person or entity recorded in Section D)

5. Date: **11/09/2006**

mm/dd/yyyy

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section D.

7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. FAX: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

Received by DEP on

11/9/2006 4:06:38 PM

IRA Status Report #2 and Plan Modification #3
November 13, 2006

SEE SEPARATELY BOUND REPORT

Immediate Response Action Plan (RTN 3-26114)
November 13, 2006

SEE SEPARATELY BOUND REPORT

